#### TITLE V PERMIT APPLICATION

for the

OGDEN MARTIN SYSTEMS OF LAKE, INC. 3830 Rogers Industrial Road Okahumpka, FL 34762 Lake County

### Prepared by:

Roy F. Weston, Inc. 187 Ballardvale Street, Suite B125 Wilmington, MA 01887-1062

and

Tom John Engineering, Inc. 8424 4th Street, Suite 12 St. Petersburg, FL 35702

June 1996

#### TITLE V PERMIT APPLICATION OUTLINE ODGEN MARTIN SYSTEMS OF LAKE, INC. OKAHUMPKA, FL

Section	<u>Title</u>
1 2	Introduction FDEP Application Forms I. Application Information II. Facility Information A. General Facility Information B. Facility Regulations C. Facility Pollutants D. Facility Pollutant Detail Information E. Facility Supplemental Information III. Emission Unit Information A. Type of Emissions Unit B. General Emissions Unit Information C. Emissions Unit Detail Information D. Emissions Unit Regulations E. Emission Point Information F. Segment Information G. Emission Unit Pollutants H. Emission Unit Pollutant Detail Information I. Visible Emissions Information J. Continuous Monitor Information K. PSD Increment Tracking Information
	L. Emission Unit Supplemental Information
Appendix	<u>Title</u>
A B C D E F G H I J	Facility Location Map Facility Plot Plan Process Flow Diagrams Fugitive Emissions Control Measures List of Insignificant Activities Compliance Report Emission Calculations Title V Core List Plant Operating Scenarios and Waste Types Processed Control Equipment Descriptions Stack Sampling Facilities
L M	Monitoring, Recordkeeping, and Reporting Requirements Existing Facility Permits

#### **SECTION 1**

#### INTRODUCTION

Ogden Martin Systems of Lake, Inc. (OMSL) owns and operates a resource recovery facility in Okahumpka, Florida. The facility is a major source as defined by the Federal Operating Permit Program (40 CFR part 70) and Florida's Title V Permit Regulations (Ch. 62-213, FAC). Accordingly, the facility is required to submit a Title V permit application for a State and Federal Operating Permit to the Florida Department of Environmental Protection (FDEP). This document contains the requisite information and FDEP permit application forms necessary for the facility to obtain an operating permit. The information contained herein has been developed to meet the completeness and accuracy requirements of both the State and Federal programs.

#### **Process Description**

The facility includes two mass-burn solid waste combustion systems that process solid waste. Solid waste is brought to the facility by truck, unloaded, and pushed into the bunker in the tipping hall. An overhead crane is used to mix the waste, separate unacceptable items, and load acceptable waste material into the two process train feed hoppers. Each processing train consists of a feed hopper, a mass-fed waterwall furnace with a horizontal grate system, a dry scrubber/baghouse filter system, an induced draft fan, a stack with individual flues, and various ancillary equipment.

Flue gas exiting each furnace passes through a dry scrubber system, where slaked lime is injected for acid gas neutralization and activated carbon for mercury and dioxin control. Particulate matter, consisting of fly ash, activated carbon, reacted salts, and unreacted lime, is then removed in the baghouse filter system. A continuous emission monitoring system measures pollutant emission levels in the stack gas.

Bottom ash from the furnaces, as well as fly ash from the dry scrubbers and baghouses, are processed in an ash handling system. Bottom ash and fly ash are then combined in the ash handling system, and with the combined ash is transported off-site to MSW ash monofills via truck or rail. Ferrous metals are continuously recovered from the ash residue.

Steam output from the two processing trains drives a turbine-generator for the generation of electricity. The net electrical energy generated by the facility is distributed via the electric distribution grid.

The majority of the permit conditions contained in this permit application are the same as those specified in the facility's existing permits [Permit Nos. AO35-193817 (PSD-FL-113) and AC35-264176]. However, clarifications to certain permit conditions have been proposed. In order to facilitate your review of this permit application, we have summarized these proposed clarifications below.

• In Permit No. AO35-193817 (PSD-FL-113), the maximum operating capacities for the municipal waste combustors (MWCs) are currently defined as a combination of

maximum solid waste and biohazardous waste throughput, heat input, and steam rates. OMSL requests that compliance with the maximum individual MWC throughput limit be demonstrated through measurement and recording of the steam rate only (not to exceed 69,000 pounds of steam per hour one a 3-hour average).

Compliance demonstration through measurement of steam flow only is requested, because of the inherent and gross inaccuracies in measuring mass throughput of solid waste.

Furthermore, solid waste is heterogeneous by nature resulting in the variable heat content. Thus, the solid waste mass throughput may vary over time even though the load as measured by steam flow remains unchanged.

• It is OMSL's understanding that the current facility permit (Permit No. AO35-193817) allows for the processing of biohazardous waste in either Combustors 1 or 2, at a rate not to exceed 2.15 tons per hour per unit and 51.6 tons per day for both units combined.

OMSL would perform initial compliance tests on Combustor 2 prior to processing biohazardous waste in accordance with Condition No. 6e of Permit No. AO35-193817.

Correspondence regarding the processing of biohazardous waste is provided in Appendix M.

#### **Additional Information**

On many of the ELSA forms, specific information was not applicable to one or more emission units. Due to limitations of the ELSA software, it was not possible to include a "Not Applicable" or "NA" statement. Thus, in such cases the non-applicable sections were left blank. Additionally, the ELSA "Pollutant Information" forms would not allow very small emission factors or emission rates to be entered, such as 6.17E-05 lb/hr (maximum potential hourly emissions of beryllium from Unit No. 1). In such cases, the emission factors or emission rates were left blank on the forms, and the "Comments" field includes a statement that this information is provided in Appendix G. Certain pages of the ELSA printouts are generated by the software based on data entered on various other forms. Bacause such pages are automatically generated by ELSA, OMSL makes no claims as to the accuracy of the information presented on such pages.

The Operation and Maintenance Plan for the facility has not been included with this permit application. This Plan is maintained at the OMSL facility and is updated as required. OMSL will notify the FDEP of any proposed changes to this Plan if such proposed changes would have an impact on air emissions or on any permit condition for the facility.

#### **SECTION 2**

**FDEP Application Forms** 

# Department of Environmental Protection

# DIVISION OF AIR RESOURCES MANAGEMENT APPLICATION FOR AIR PERMIT - LONG FORM

#### I. APPLICATION INFORMATION

#### Identification of Facility Addressed in This Application

1. Facility Owner/Company Name:		
Gary K. Crane, Ph.D.		
2. Site Name :	<del>.</del>	
Ogden Martin Systems of Lake, Inc.		
3. Facility Identification Number:		[X] Unknown
4. Facility Location:		
Ogden Martin Systems of Lake, Inc.		
3830 Rogers Industrial Park Road		
Okahumpka, FL 34762 35OR135004		
330K133004		
Street Address or Other Locator:	3830 Rogers Industr	rial Park Rd
City: Okahumpka	County: Lake	Zip Code: 34762-
5. Relocatable Facility?		6. Existing Permitted Facility?
[ ] Yes [X] No		[X] Yes [] No

DEP Form No. 62-210.900(1) - Form

### Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:  Name: Gary K. Crane, Ph.D. Title: Executive Vice President  2. Owner or Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: Ogden Martin Systems of Lake, Inc. Street Address: 3830 Rogers Industrial Park Rd City: Okahumpka State: Zip Code: 34762-  3. Owner/Authorized Representative or Responsible Official Telephone Numbers:  Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
Title: Executive Vice President  2. Owner or Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: Ogden Martin Systems of Lake, Inc. Street Address: 3830 Rogers Industrial Park Rd City: Okahumpka State: Zip Code: 34762-  3. Owner/Authorized Representative or Responsible Official Telephone Numbers:  Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
Title: Executive Vice President  2. Owner or Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: Ogden Martin Systems of Lake, Inc. Street Address: 3830 Rogers Industrial Park Rd City: Okahumpka State: Zip Code: 34762-  3. Owner/Authorized Representative or Responsible Official Telephone Numbers:  Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
Organization/Firm: Ogden Martin Systems of Lake, Inc.  Street Address: 3830 Rogers Industrial Park Rd  City: Okahumpka  State: Zip Code: 34762-  3. Owner/Authorized Representative or Responsible Official Telephone Numbers:  Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
Street Address: 3830 Rogers Industrial Park Rd City: Okahumpka State: Zip Code: 34762-  3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
Street Address: 3830 Rogers Industrial Park Rd City: Okahumpka State: Zip Code: 34762-  3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
State: Zip Code: 34762-  3. Owner/Authorized Representative or Responsible Official Telephone Numbers:  Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
<ol> <li>Owner/Authorized Representative or Responsible Official Telephone Numbers:         Telephone: (201)882-7248 Fax: (201)882-4167     </li> <li>Owner/Authorized Representative or Responsible Official Statement:         I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after     </li> </ol>
Telephone: (201)882-7248 Fax: (201)882-4167  4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
4. Owner/Authorized Representative or Responsible Official Statement:  I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after
reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.  Signature  Signature

\* Attach letter of authorization if not currently on file.

I. Part 2 - 1

DEP Form No. 62-210.900(1) - Form

# Scope of Application

Emissions Unit ID	Description of Emissions Unit		
001	MWC Unit 1	1	
002	MWC Unit 2	1	
003	Activated Carbon Storage Silo	1	
No Id	Lime Storage Silo	1	
No Id	Cooling Tower		

DEP Form No. 62-210.900(1) - Form Effective : 3-21-96

#### Purpose of Application and Category

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

- [X] Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
- [ ] Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number:

Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed:

[ ] Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:

Operation permit to be revised:

[ ] Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application.

Operation permit to be revised/corrected:

I. Part 4 - 1

DEP Form No. 62-210.900(1) - Form

[ ] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit.
Operation permit to be revised:
Reason for revision:
Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.
This Application for Air Permit is submitted to obtain:
[ ] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.
Current operation/construction permit number(s):
[ ] Renewal air operation permit under Fule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.
Operation permit to be renewed:
[ ] Air operation permit revision for a synthetic non-Title V source.
Operation permit to be revised:
Reason for revision:
Category III: All Air Construction Permit Applications for All Facilities and Emissions Units
This Application for Air Permit is submitted to obtain:
[ ] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).
I. Part 4 - 2 DEP Form No. 62-210.900(1) - Form
Effective: 3-21-96

Current operation permit number(s), if any:

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s):

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

I. Part 4 - 3

DEP Form No. 62-210.900(1) - Form

Application Processing Fee				
Check one:				
[ ] Attached - Amount : [X]	Not Applicable.			
Construction/Modification Information				
1. Description of Proposed Project or Alterations:				
NA				
2. Projected or Actual Date of Commencement of Construction :				
3. Projected Date of Completion of Construction:				
Professional Engineer Certification				
1. Professional Engineer Name: Tom T. John				
Registration Number: 33157				
2. Professional Engineer Mailing Address:				
Tom John Engineering, Inc.  Street Address: 8424 4th Street North, Ste. 12  City: St Petersburg	State: FL Zip Code: 35702-			
3. Professional Engineer Telephone Numbers: Telephone: (813)579-0403	ax: (813)579-0205			
(313)513				

#### 4. Professional Engineer Statement:

I, the undersigned, hereby certified, except as particularly noted herein\*, that:

- (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
- (2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all visions contained in such permit.

11 June 1996 Date

Attach any exception to certification statement.

I. Part 6 - 1

DEP Form No. 62-210.900(1) - Form

#### **Application Contact**

1. Name and Title of Application Contact:

Name: Jason M. Gorrie

Title: Environmental Engineer

2. Application Contact Mailing Address:

Organization/Firm:

Ogden Martin Systems of Pasco, Inc.

Street Address:

14230 Hays Road

City:

Spring Hill

FL

State:

Zip Code: 34610-

3. Application Contact Telephone Numbers:

Telephone: (813)856-2917

Fax: (813)856-0007

#### **Application Comment**

Facility currently has Air Permit No. AO35-193817 (PSD-FL-113) for Emission Unit Nos. 1 and 2; and AC35-264176 for Emission Unit No. 3.

#### II. FACILITY INFORMATION

#### A. GENERAL FACILITY INFORMATION

### Facility, Location, and Type

1. Facility UTM Coord	linates:		
Zone: 17	East (km): 41	3.12 North (kn	n): 3179.21
2. Facility Latitude/Lor	ngitude:		
Latitude (DD/MM/S	S): 28 44 22	Longitude (DD/MM/SS):	: 81 53 23
3. Governmental	4. Facility Status	5. Facility Major	6. Facility SIC(s):
Facility Code:	Code:	Group SIC Code:	
0	A	49	
7. Facility Comment:			
Full SIC Code is 4953			

#### **Facility Contact**

Name and Title of F     Jason M. Gorrie     Environmental Engine	·	,	
_	iling Address: Ogden Martin Systems of Pasco 14230 Hays Road Spring Hill	o, Inc. State: FL Zip Code: 34610	
3. Facility Contact Tel Telephone: (813)	•	x: (813)856-0007	

DEP Form No. 62-210.900(1) - Form

# Facility Regulatory Classifications

1. Small Business Stationary Source?	<del></del>
1. Small Business Stationary Source?	N
	1
2. Title V Source?	
	Y
3. Synthetic Non-Title V Source?	,,
	N
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
,	Y
5. Synthetic Minor Source of Pollutants Other than HAPs?	, ,
	N
6. Major Source of Hazardous Air Pollutants (HAPs)?	
o. Major Bodice of Hazardous All Foliatalits (HAT 3).	Y
`·	
7. Synthetic Minor Source of HAPs?	
	N
8. One or More Emissions Units Subject to NSPS?	<u> </u>
a. One of wore Emissions Onits Subject to NSI S:	Y
	1
9. One or More Emission Units Subject to NESHAP?	
·	N
10. Tide V.Come by FDA Designation 2	
10. Title V Source by EPA Designation?	Y
	I
11. Facility Regulatory Classifications Comment:	
	ļ

#### **B. FACILITY REGULATIONS**

Rule	Appli	cability	Ana	lysis

Not Applicable			

DEP Form No. 62-210.900(1) - Form

#### **B. FACILITY REGULATIONS**

#### **List of Applicable Regulations**

40 CFR 60 Subpart A General Provisions

40 CFR 61 Test Methods

62-211, F.A.C. PSD

62-213, F.A.C. Operating Permits

62-296.320(2) Objectional Odor Prohibited

62-296.320(3) Open Burning Prohibited

62-296.300(4)(c) Unconfined PM Emissions

FDEP Title V Core List

II. Part 3b - 1

DEP Form No. 62-210.900(1) - Form

### C. FACILITY POLLUTANTS

# Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification

II. Part 4 - 1

### D. FACILITY POLLUTANT DETAIL INFORMATION

	Pollutant	
·		

II. Part 4b - 1

#### D. FACILITY SUPPLEMENTAL INFORMATION

#### Supplemental Requirements for All Applications

1. Area Map Showing Facility Location:	Appendix A
2. Facility Plot Plan:	Appendix B
3. Process Flow Diagram(s):	Appendix C
4. Precautions to Prevent Emissions of Unconfined Particulate Matter:	Appendix D
5. Fugitive Emissions Identification :	Appendix D
6. Supplemental Information for Construction Permit Application :	NA

#### Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities:	Appendix E
8. List of Equipment/Activities Regulated under Title VI:	NA
9. Alternative Methods of Operation:	NA
10. Alternative Modes of Operation (Emissions Trading):	NA
11. Identification of Additional Applicable Requirements:	Appendix L
12. Compliance Assurance Monitoring Plan :	NA
13. Risk Management Plan Verification :	NA
14. Compliance Report and Plan :	Appendix F
15. Compliance Certification (Hard-copy Required):	Appendix F

II. Part 5 - 1

DEP Form No. 62-210.900(1) - Form

# A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Emissions Unit Information Section	
MWC Unit 1	
Type of Emissions Unit Addressed in This Section	
1. Regulated or Unregulated Emissions Unit? Check one:	
[X] The emissions unit addressed in this Emissions Unit Infemissions unit.	Formation Section is a regulated
[ ] The emissions unit addressed in this Emissions Unit Info emissions unit.	formation Section is an unregulated
2. Single Process, Group of Processes, or Fugitive Only? Check	one:
[X] This Emissions Unit Information Section addresses, as a process or production unit, or activity, which produces that at least one definable emission point (stack or vent).	one or more air pollutants and which
[ ] This Emissions Unit Information Section addresses, as a process or production units and activities which has at le (stack or vent) but may also produce fugitive emissions.	east one definable emission point
[ ] This Emissions Unit Information Section addresses, as a process or production units and activities which produce	•

III. Part 1 - 1

DEP Form No. 62-210.900(1) - Form

# A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Emissio	ons Unit Information Section 2
MWC U	nit 2
Type of	Emissions Unit Addressed in This Section
1. Regu	alated or Unregulated Emissions Unit? Check one:
[X]	The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
[ ]	The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.
2. Sing	le Process, Group of Processes, or Fugitive Only? Check one:
[ X]	This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
[ ]	This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
[ ]	This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

III. Part 1 - 2

DEP Form No. 62-210.900(1) - Form

# A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Emissic	ons Unit Information Section 3
Activate	d Carbon Storage Silo
Type of	Emissions Unit Addressed in This Section
1. Regu	ulated or Unregulated Emissions Unit? Check one:
[X]	The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
[ ]	The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.
2. Sing	le Process, Group of Processes, or Fugitive Only? Check one:
[ X]	This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
[ ]	This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
[ ]	This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

III. Part 1 - 3

DEP Form No. 62-210.900(1) - Form

# A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Lime Sto	orage Silo
Type of	Emissions Unit Addressed in This Section
1. Regu	ulated or Unregulated Emissions Unit? Check one:
[X]	The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
[ ]	The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.
2. Sing	le Process, Group of Processes, or Fugitive Only? Check one:
[ X]	This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
[ ]	This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
[ ]	This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

III. Part 1 - 4

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

# A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 5
Cooling Tower
Type of Emissions Unit Addressed in This Section
1. Regulated or Unregulated Emissions Unit? Check one:
[ ] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
[X] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.
2. Single Process, Group of Processes, or Fugitive Only? Check one:
[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

III. Part 1 - 5

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b>	1
---	---

### **Emissions Unit Description and Status**

1. Desc	cription of Emissions Unit	Addressed in	This Section:		
MW	C Unit 1				
	· .				
2. Emi	ssions Unit Identification	Number:	001		
	[ ] No Corresponding I	D	[ ] Ur	nknown	
3. Emi	ssions Unit Status	4. Acid Rain	Unit?	5. Emissions Unit Major	
Co	de: A	[ ] Yes	[X] No	Group SIC Code:	49
6. Emi	ssions Unit Comment:				
com by c	bustion residence time of at	least one second shall be no less	d, and the furnace than 1138 degrees	ss than 1800 degrees F for a room temperature as determines F (as per 5/25/93 amendmen and is not a package unit.	

III. Part 2 - 1

DEP Form No. 62-210.900(1) - Form

-		WY	T C	C 4.
H	miccione	Unit	Information	i Section

# **Emissions Unit Description and Status**

Description of Emissions Unit     MWC Unit 2	Addressed in This Sec	etion :		
2. Emissions Unit Identification	Number :	002		
[ ] No Corresponding II	D	[ ] Un	known	
3. Emissions Unit Status	4. Acid Rain Unit?		5. Emissions Unit Major	
Code: A	[ ] Yes [X]	No	Group SIC Code:	49
6. Emissions Unit Comment:				
Mean temperature at fully mixed zone of incinerator shall be no less than 1800 degrees F for a combustion residence time of at least one second, and the furnace room temperature as determined by control room instumentation, shall be no less than 1138 degrees F (as per 5/25/93 amendment to Permit No. AO35-193817). Emission unit was constructed on site and is not a package unit.				

DEP Form No. 62-210.900(1) - Form

<b>Emissions</b>	Unit !	Information	Section	3
------------------	--------	-------------	---------	---

### **Emissions Unit Description and Status**

1.	Description of Emissions Unit	Addressed in	This Section:		
	Activated Carbon Storage Silo				
L					
2.	<b>Emissions Unit Identification</b>	Number:	003		
	[ ] No Corresponding I	D	ן ] ו	Unknown	
3.	Emissions Unit Status	4. Acid Rain	Unit?	5. Emissions Unit Major	
	Code: A	1	[X] No	Group SIC Code:	49
6.	Emissions Unit Comment:				
	Activated carbon from the silo i mercury and dioxin emissions fi				

<b>Emissions</b>	Unit	Information	Section	4
------------------	------	-------------	---------	---

#### **Emissions Unit Description and Status**

1. Description of Emissions Uni	t Addressed in This Sectio	n :
Lime Storage Silo		
.*		
2. Emissions Unit Identification	Number:	
[X] No Corresponding	ID [	] Unknown
3. Emissions Unit Status	4. Acid Rain Unit?	5. Emissions Unit Major
Code: A	[ ] Yes [X] No	Group SIC Code: 49
6. Emissions Unit Comment:	<u> </u>	
Lime from the silo is injected in control from the combustors.	_	Jnit Nos. 1 and 2 for acid gas emissions aghouse filter.

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

5

#### **Emissions Unit Description and Status**

1. Description of Emissions Unit	Addressed in This Section	on:	
Cooling Tower			
·			
2. Emissions Unit Identification	Number:		
[X] No Corresponding I	D [	] Unknown	
3. Emissions Unit Status	4. Acid Rain Unit?	5. Emissions Unit Major	
Code: A	[ ] Yes [X] No	Group SIC Code: 49	
6. Emissions Unit Comment:			
prevent bacterial growth, scaling	g, and corrosion. It has no e tification of any potential e	oling tower utilizes water and additives to emissions control devices. This unit has missions has been performed. This unit ig, or reporting requirements.	

DEP Form No. 62-210.900(1) - Form

MWC Unit 1				٠	
Emissions Unit Control Equipment	1				
1. Description:			·		
Lime injection into flue and with subse	anant mamarial	from backouse	for said and and	1	

Lime injection into flue gas with subsequent removal from baghouse for acid gas control

2. Control Device or Method Code:

67

III. Part 3 - 1

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

Emissions Unit Information Section MWC Unit 1	1
Emissions Unit Control Equipment	2
1. Description:	
Carbon injection into flue gas with subs	sequent removal from baghouse for mercury and dioxin control
2. Control Device or Method Code :	99

III. Part 3 -

2

DEP Form No. 62-210.900(1) - Form

Emissions	Unit	Information Section	1
<b>MWC</b> Unit	1		

### **Emissions Unit Control Equipment** 3

1. Description:				
ol				
·				
16				

III. Part 3 - 3

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 2 MWC Unit 2

#### Emissions Unit Control Equipment 1

Description:	
Lime injection into flue gas with subseque	ent removal from baghouse for acid gas control
Control Device or Method Code:	67
4.	
	Description:  Lime injection into flue gas with subseque  Control Device or Method Code:

III. Part 3 - 4

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b>	2
MWC Unit 2	

# Emissions Unit Control Equipment 2

1.	Description:
	Carbon injection into flue gas with subsequent removal from baghouse for mercury and dioxin control
2.	Control Device or Method Code: 99

III. Part 3 - 5

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b>	2
MWC Unit 2	

# **Emissions Unit Control Equipment** 3

1. Description:		
Baghouse fabric filter for particulate con-	trol	
2. Control Device or Method Code:	16	

III. Part 3 -

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b>	3
Activated Carbon Storage Silo	

# Emissions Unit Control Equipment 1

1.	Description:			
	Baghouse filter on activated carbon storage	silo exhaust		
			<del></del>	 
2.	Control Device or Method Code:	18		
1				

<b>Emissions Unit Information Section</b>	4
Lime Storage Silo	

# Emissions Unit Control Equipment

1. Description:	
Baghouse filter on lime storage silo exhaus	st ·
2. Control Device or Method Code:	18



# C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

<b>Emissions Unit Information Section</b>	1
MWC Unit 1	

### **Emissions Unit Details**

1. Initial Startup Date :	22-Aug-1990	
2. Long-term Reserve Shutdown Date:		
3. Package Unit:		
Manufacturer: NA		Model Number: NA
4. Generator Nameplate Rating: 15	MW	
5. Incinerator Information:	·	
Dwell Temperature :	1,800	Degrees Fahrenheit
Dwell Time:	1.00	Seconds
Incinerator Afterburner Temperature:		Degrees Fahrenheit

### **Emissions Unit Operating Capacity**

1.	Maximum Heat Input Rate:	120	mmBtu/hr			
2.	Maximum Incinerator Rate :	24000.00	lb/hr	288.00	tons/day	
3.	Maximum Process or Throughput	Rate:	69000	lb/ł	ar steam	
4.	Maximum Production Rate:	-	N	NA .		
5.	5. Operating Capacity Comment:  Measurement of steam rate (69,000 lb/hr, 3-hr rolling average) is requested as method of demonstrating compliance with throughput limit. See Section 1 of this permit application.					

### **Emissions Unit Operating Schedule**

Requested Maximum Operating Schedule:			
	24 hours/day	7 days/week	
	52 weeks/year	8,760 hours/year	

III. Part 4 - 1

DEP Form No. 62-210.900(1) - Form

III. Part 4 -

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

# C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

MWC Unit 2

2

### **Emissions Unit Details**

1. Initial Startup Date:	22-Aug-1990	
2. Long-term Reserve Shutdown Date:		
3. Package Unit:	<del></del>	
Manufacturer: NA		Model Number: NA
4. Generator Nameplate Rating: 15	MW	
5. Incinerator Information:		
Dwell Temperature :	1,800	Degrees Fahrenheit
Dwell Time :	1.00	Seconds
Incinerator Afterburner Temperature :		Degrees Fahrenheit

### **Emissions Unit Operating Capacity**

1.	Maximum Heat Input Rate:	120	mmBtu/hr		
2.	Maximum Incinerator Rate:	24000.00	lb/hr	288.00	tons/day
3.	Maximum Process or Throughput	Rate:	69000	lb/h	nr steam
4.	Maximum Production Rate:		N/	4	
5.	Operating Capacity Comment:  Measurement of steam rate (69,000 lb/hr, 3-hr rolling average) is requested as method of demonstrating compliance with throughput limit. See Section 1 of this permit application.				

### **Emissions Unit Operating Schedule**

Requested Maximum Op	perating Schedule:	
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year

III. Part 4 -

3

DEP Form No. 62-210.900(1) - Form

III. Part 4 -

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

# C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

Emissions	Unit	Information	Section
-----------	------	-------------	---------

3

Activated Carbon Storage Silo

### **Emissions Unit Details**

1. Initial Startup Date:	14-Jun-1995	
2. Long-term Reserve Shutdown Date :		
3. Package Unit:		
Manufacturer: Tech-Air		Model Number: SBR-25-6-230
4. Generator Nameplate Rating:	MW	
5. Incinerator Information:		
Dwell Temperature :		Degrees Fahrenheit
Dwell Time :		Seconds
Incinerator Afterburner Temperature:		Degrees Fahrenheit

### **Emissions Unit Operating Capacity**

1. Maximum Heat Input Rate:	mmBtu/hr				
2. Maximum Incinerator Rate :	lb/hr	tons/day			
3. Maximum Process or Throughput Rate:	650	cfm exhaust air			
4. Maximum Production Rate:	NA				
Carbon is pneumatically conveyed into silo fror					

### **Emissions Unit Operating Schedule**

Requested Maximum Operating Schedule:						
24 hours/day	7 days/week					
52 weeks/year	8,760 hours/year					

III. Part 4 - 5

DEP Form No. 62-210.900(1) - Form

III. Part 4 -

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

# C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

<b>Emissions Unit Information Section</b>	4
Lime Storage Silo	

### **Emissions Unit Details**

1. Initial Startup Date :	22-Aug-1990	
2. Long-term Reserve Shutdown Date:		
3. Package Unit:		<del></del>
Manufacturer: Flex-Kleen		Model Number: 84BVBS-25-II
4. Generator Nameplate Rating:	MW	
5. Incinerator Information:		
Dwell Temperature :		Degrees Fahrenheit
Dwell Time :		Seconds
Incinerator Afterburner Temperature:		Degrees Fahrenheit

### **Emissions Unit Operating Capacity**

1.	Maximum Heat Input Rate :	mmBtu/hr	
2.	Maximum Incinerator Rate :	lb/hr	tons/day
3.	Maximum Process or Throughput Rate :	650	cfm exhaust air
4.	Maximum Production Rate :	NA	
5.	Operating Capacity Comment: Silo holds approximately 1585 cubic feet of limpneumatically conveyed into silo from truck. If fan on silo operates only during filing of silo.		•

### **Emissions Unit Operating Schedule**

Requested Maximum Operating Sc	chedule:	
2	4 hours/day	7 days/week
53	2 weeks/year	8,760 hours/year

III. Part 4 - 7

DEP Form No. 62-210.900(1) - Form

III. Part 4 -

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

# C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

Emissions Unit Information Section 5 Cooling Tower		
Emissions Unit Details		
1. Initial Startup Date :		
2. Long-term Reserve Shutdown Date:		
3. Package Unit:		
Manufacturer:		Model Number:
4. Generator Nameplate Rating:	MW	
5. Incinerator Information:		
Dwell Temperature:		Degrees Fahrenheit
Dwell Time :		Seconds
Incinerator Afterburner Temperature :		Degrees Fahrenheit
Emissions Unit Operating Capacity		
1. Maximum Heat Input Rate:	mmBtu/hr	
2. Maximum Incinerator Rate :	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	<del></del>	
4. Maximum Production Rate:		
5. Operating Capacity Comment :		
Emissions Unit Operating Schedule		
Requested Maximum Operating Schedule:	<del></del>	
hours/day		days/week
weeks/year		hours/year

III. Part 4 -

DEP Form No. 62-210.900(1) - Form

MWC Unit 1		-							
Rule Applicability Analysis									
NA									
}	tule Applicability Analysis	Rule Applicability Analysis	tule Applicability Analysis	tule Applicability Analysis	tule Applicability Analysis				

III. Part 6a - 1

DEP Form No. 62-210.900(1) - Form

MWC Unit 2	
Rule Applicability Analysis	
NA	

III. Part 6a - 2

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section Activated Carbon Storage Silo				
Rule Applicability Analysis	·			
NA	 		 	

III. Part 6a - 3

DEP Form No. 62-210.900(1) - Form

Lime Storage Silo	4	
Rule Applicability Analysis		
NA		

III. Part 6a - 4

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section Cooling Tower	5
Rule Applicability Analysis	

III. Part 6a - 5

DEP Form No. 62-210.900(1) - Form

MWC Unit 1

#### List of Applicable Regulations

FDEP Title V Core List

40 CFR 60 Subpart E Incinerators

40 CFR 60 Subpart Db Steam Generating Units

40 CFR 60 Appendix B CEM required

40 CFR 60 Appendix A Test Methods

62-212, F.A.C. PSD

17-712, F.A.C. Biomedical and Biological Waste

62-296.320 Pollutant Emission Limiting Standards

62-296.416 Waste-to-Energy Facilities

FDEP Permit No. AO35-193817

FDEP Permit No. PSD-FL-113

40 CFR 60 App. F CEM Quality Assurance

62-296.401 Biological Waste Incinerators

40 CFR 60 Subpart A General Provisions

III. Part 6b - 1

DEP Form No. 62-210.900(1) - Form

<b>Emissions</b>	Unit	Information	Section	
MWC Unit	1			_

1

List of Applicable Regulations

III. Part 6b - 2

DEP Form No. 62-210.900(1) - Form

#### List of Applicable Regulations

FDEP Title V Core List

40 CFR 60 Subpart E Incinerators

40 CFR 60 Subpart Db Steam Generating Units

40 CFR 60 Appendix B CEM required

40 CFR 60 Subpart A General Provisions

40 CFR 60 Appendix A Test Methods

62-212, F.A.C. PSD

17-712, F.A.C. Biomedical and Biological Waste

62-296.320 Pollutant Emission Limiting Standards

62-296.416 Waste-to-Energy Facilities

FDEP Permit No. AO35-193817

FDEP Permit No. PSD-FL-113

40 CFR 60, App. F CEM Quality Assurance

62-296.401 Biological Waste Incinerators

III. Part 6b - 3

DEP Form No. 62-210.900(1) - Form

# **Emissions Unit Information Section** MWC Unit 2

2

List of Applicable Regulations

III. Part 6b - 4

DEP Form No. 62-210.900(1) - Form

#### **Emissions Unit Information Section**

3

Activated Carbon Storage Silo

### **List of Applicable Regulations**

FDEP Title V Core List

FDEP Permit No. AC35-264176

62-296.320(2) Pollutant Emission Limiting Standards

62-297.620(4) VE Limit

62-296.310(2) Visible emissions

### **Emissions Unit Information Section**

Lime Storage Silo

### List of Applicable Regulations

FDEP Title V Core List

62-296.320(2) Pollutant Emission Limiting Standards

62-297.620(4) VE Limit

62-296.310(2) Visible emissions

MWC Unit 1		
Emission Point Description and Type:		
1. Identification of Point on Plot Plan or Flow Diagram :	Stack No. #1	
2. Emission Point Type Code:		
3. Descriptions of Emission Points Comprising this Emission	ons Unit :	
NA		
4. ID Numbers or Descriptions of Emission Units with this	Emission Poin	t in Common :
NA		
5. Discharge Type Code:	V	
6. Stack Height:	199	feet
7. Exit Diameter :	4.3	feet
8. Exit Temperature :	270	°F
9. Actual Volumetric Flow Rate:	59400	acfm
10. Percent Water Vapor:	16.20	%
11. Maximum Dry Standard Flow Rate:	43200	dscfm
12. Nonstack Emission Point Height:		feet
13. Emission Point UTM Coordinates:		
Zone: 17 East (km): 413.120	North (kı	m): 3179.210
14. Emission Point Comment:  Percent water vapor is from typical stack test data. Dry star moisture content. Emission Units No. 1 and 2 discharge inc and 2, respectively, which are colocated in a single support	dependantly thro	

III. Part 7a - 1

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section

DEP Form No. 62-210.900(1) - Form Effective : 3-21-96

Emissions Unit Information Section 2		
MWC Unit 2		
Emission Point Description and Type:		
1. Identification of Point on Plot Plan or Flow Diagram:	Stack No. #2	<del> </del>
2. Emission Point Type Code: 1	······································	
3. Descriptions of Emission Points Comprising this Emissio	ns Unit:	<del></del>
NA		
4. ID Numbers or Descriptions of Emission Units with this l	Emission Poin	in Common:
NA		
5. Discharge Type Code:	v	
6. Stack Height:	199	feet
7. Exit Diameter :	4.3	feet
8. Exit Temperature :	270	°F
9. Actual Volumetric Flow Rate:	59400	acfm
10. Percent Water Vapor:	16.20	%
11. Maximum Dry Standard Flow Rate:	43200	dscfm
12. Nonstack Emission Point Height:	·	feet
13. Emission Point UTM Coordinates:	<del></del>	
Zone: 17 East (km): 413.120	North (kr	n): 3179.210
14. Emission Point Comment:  Percent water vapor is from typical stack test data. Dry stan moisture content. Emission Units No. 1 and 2 discharge ind and 2, respectively, which are colocated in a single support state.	ependantly thro	

III. Part 7a - 3

DEP Form No. 62-210.900(1) - Form

III. Part 7a - 4

DEP Form No. 62-210.900(1) - Form Effective : 3-21-96

Activated Carbon Storage Silo		
Emission Point Description and Type:		
1. Identification of Point on Plot Plan or Flow Diagram:	Vent S/V #3	
2. Emission Point Type Code:		
3. Descriptions of Emission Points Comprising this Emission	ons Unit :	
NA		
4. ID Numbers or Descriptions of Emission Units with this	Emission Point	t in Common :
NA		
5. Discharge Type Code:	Н	
6. Stack Height:	53	feet
7. Exit Diameter :	0.8	feet
8. Exit Temperature :	77	°F
9. Actual Volumetric Flow Rate :	650	acfm
10. Percent Water Vapor:		%
11. Maximum Dry Standard Flow Rate:	650	dscfm
12. Nonstack Emission Point Height:		feet
13. Emission Point UTM Coordinates:		
Zone: 17 East (km): 413.120	North (kr	m): 3179.210
14. Emission Point Comment:  Exhaust is 8-inch square duct. Percent water vapor is negli	gible.	

III. Part 7a - 5

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section

Lime Storage Silo		
Emission Point Description and Type:		
1. Identification of Point on Plot Plan or Flow Diagram:	ent S/V #4	
2. Emission Point Type Code:		
3. Descriptions of Emission Points Comprising this Emissions	Unit:	
NA		
4. ID Numbers or Descriptions of Emission Units with this Em	ission Point	in Common:
NA		
5. Discharge Type Code:	Н	
6. Stack Height:	68	feet
7. Exit Diameter :	1.3	feet
8. Exit Temperature :	77	°F
9. Actual Volumetric Flow Rate:	650	acfm
10. Percent Water Vapor:		%
11. Maximum Dry Standard Flow Rate:	650	dscfm
12. Nonstack Emission Point Height:		feet
13. Emission Point UTM Coordinates:		
Zone: 17 East (km): 413.120	North (kn	n): 3179.210
14. Emission Point Comment:  Exhaust is 15 inch by 12 inch duct. Percent water vapor is negl	igible.	

III. Part 7a - 6

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section

5

Emission Point Description and Type:	
1. Identification of Point on Plot Plan or Flow Diagram:	
2. Emission Point Type Code :	
3. Descriptions of Emission Points Comprising this Emission	ons Unit :
4. ID Numbers or Descriptions of Emission Units with this	Emission Point in Common :
5. Discharge Type Code:	
6. Stack Height:	feet
7. Exit Diameter :	feet
8. Exit Temperature :	°F
9. Actual Volumetric Flow Rate:	acfm
10. Percent Water Vapor:	%
11. Maximum Dry Standard Flow Rate:	dscfm
12. Nonstack Emission Point Height:	feet
13. Emission Point UTM Coordinates:	
Zone: East (km):	North (km):
14. Emission Point Comment:	

III. Part 7a - 7

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

**Cooling Tower** 

Emissions Unit Information Section 1
MWC Unit 1
Segment Description and Rate: Segment 1
1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode):
Solid Waste, mass burn, water wall furnace.
2. Source Classification Code (SCC): 1-01-012-01
3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 12.00 5. Maximum Annual Rate: 105,120.00
6. Estimated Annual Activity Factor: 0.00
7. Maximum Percent Sulfur:  8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 10
10. Segment Comment :
Maximum percent sulfur and ash are not applicable. Maximum hourly rate represents nominal rate based on solid waste heat content of 5,000 Btu/lb. See Section 1 of permit application.

III. Part 8 - 1

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

Emissions Unit Information Section 1
MWC Unit 1
Segment Description and Rate: Segment 2
1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode):
Natural gas firing to heat combustors to minimum temperature for startup, shutdown, malfunction.  Maximum hourly rate based on 1,000 Btu/cu.ft. natural gas and 120 mmBtu/hr maximum heat input.  Maximum annual rate is not applicable.
2. Source Classification Code (SCC): 1-01-012-01
3. SCC Units : Million Cubic Feet Processed
4. Maximum Hourly Rate: 0.12 5. Maximum Annual Rate:
6. Estimated Annual Activity Factor: 0.00
7. Maximum Percent Sulfur: 0.00 8. Maximum Percent Ash: 0.00
9. Million Btu per SCC Unit: 1,000
10. Segment Comment :
Natural gas is used as a secondary fuel for flame stabilization and during startup, shutdown, and malfunction.

III. Part 8 - 2

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

Emissions Unit Information Section 2	<u> </u>			
MWC Unit 2				
Segment Description and Rate: Segment 1				
<ol> <li>Segment Description (Process/Fuel Type and Solid Waste, mass burn, water wall furnace.</li> </ol>	Associated Operating Method/Mode):			
2. Source Classification Code (SCC): 1-01-	012-01			
3. SCC Units: Tons Processed				
4. Maximum Hourly Rate: 12.00	5. Maximum Annual Rate: 105,120.00			
6. Estimated Annual Activity Factor: 0.00				
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:			
9. Million Btu per SCC Unit: 10				
10. Segment Comment:  Maximum percent sulfur and ash are not applicate based on a solid waste heat content of 5,000 Btu	able. Maximum hourly rate represents nominal rate a/lb. See Section 1 of permit applicationt.			

III. Part 8 - 3

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 2
MWC Unit 2
Segment Description and Rate: Segment 2
1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode):
Natural gas firing to heat combustors to minimum temperature for startup, shutdown, and malfunction. Maximum hourly rate based on 1,000 Btu/cu.ft. natural gas and 120 mmBtu/hr maximum heat input. Maximum annual rate is not applicable.
2. Source Classification Code (SCC): 1-01-012-01
3. SCC Units: Million Cubic Feet Processed
4. Maximum Hourly Rate: 0.12 5. Maximum Annual Rate:
6. Estimated Annual Activity Factor: 0.00
7. Maximum Percent Sulfur: 0.00 8. Maximum Percent Ash: 0.00
9. Million Btu per SCC Unit: 1,000
10. Segment Comment:
Natural gas is used as a secondary fuel for flame stabilization and during startup, shutdown, and malfunction periods.

III. Part 8 - 4

DEP Form No. 62-210.900(1) - Form

Emissions Unit	t Information Se	ction 3	_	
Activated Carbon	n Storage Silo			
Segment Description and Rate: Segment 1				
1. Segment De	escription (Proces	s/Fuel Type and	Associated Operating Method/N	Mode):
Storage of a	ctivated carbon			
2. Source Class	sification Code (	SCC): 3-99-	999-99	
3. SCC Units :	Million Cubic	Feet Processed		·
4. Maximum F	Hourly Rate:	0.04	5. Maximum Annual Rate :	341.64
6. Estimated A	annual Activity F	actor:		
7. Maximum F	Percent Sulfur:		8. Maximum Percent Ash:	· · · · · · · ·
9. Million Btu	per SCC Unit :		<u>:</u>	
10. Segment C	Comment :			
	epresent exhaust a with baghouse filt	•	ugh silo exhaust during silo filling	operations. Exhaust

III. Part 8 - 5

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section	<del>1</del>			
Lime Storage Silo				
Segment Description and Rate: Segment 1				
1. Segment Description (Process/Fuel Type an	nd Associated Operating Method/Mode):			
Storage of lime.				
2. Source Classification Code (SCC): 3-9	9-999-99			
3. SCC Units: Million Cubic Feet Processed				
4. Maximum Hourly Rate: 0.04	5. Maximum Annual Rate: 341.64			
6. Estimated Annual Activity Factor:				
o. Estimated Aminda Activity 1 dotor .				
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:			
9. Million Btu per SCC Unit:				
•				
10. Segment Comment :				
SCC units represent flowrate of air discharged Exhaust is equipped with baghouse filter.	d through silo exhaust during silo filling operations.			
, ,,				

III. Part 8 - 6

DEP Form No. 62-210.900(1) - Form

#### F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section	5
Cooling Tower	
Segment Description and Rate: Segment	t <u>1</u>
1. Segment Description (Process/Fuel Type as	nd Associated Operating Method/Mode):
Cooling tower utilizes water and additives to	prevent or inhibit bacterial growth, scaling, or corrosion.
2. Source Classification Code (SCC): 3-9	99-999-99
3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur :	8. Maximum Percent Ash:
9. Million Btu per SCC Unit :	
10. Segment Comment :	
·	ctivity factor, percent sulfur, ash, and million Btu per SCC gulated emission unit with no quantifiable emissions

III. Part 8 - 7

DEP Form No. 62-210.900(1) - Form

# G. EMISSIONS UNIT POLLUTANTS (Regulated and Unregulated Emissions Units)

<b>Emissions</b>	Unit	Information	Section	1
<b>MWC Unit</b>	1			

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
СО	029		·
PB	016		
NOX	042		
PM	016		
SO2	042		
VOC	099		
FL	016		
HCL	067		
H021	016		
H114	099		
СО	029		
PB	016		
NOX	042		

III. Part 9a - 1

DEP Form No. 62-210.900(1) - Form

#### G. EMISSIONS UNIT POLLUTANTS (Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 2 MWC Unit 2

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	016		
SO2	042		
VOC	. 099		
FL	016		
HCL	067		
H021	016		
H114	099		·
PM	018		
PM	018		

III. Part 9a - 2

DEP Form No. 62-210.900(1) - Form

	vC Unit 1
Po	llutant Potential/Estimated Emissions: Pollutant 1
1.	Pollutant Emitted: CO
2.	Total Percent Efficiency of Control: %
3.	Potential Emissions : 16.13 lb/hour 70.63 tons/year
4.	Synthetically Limited? [ ] Yes [X ] No
5.	Range of Estimated Fugitive/Other Emissions:  to tons/year
6.	Emissions Factor: Reference: Permit AO35-193817
7.	Emissions Method Code: 5
8.	Calculations of Emissions :
	See Appendix G.
9.	Pollutant Potential/Estimated Emissions Comment :
	FDEP permit emission limitation used to calculate potential emissions.

III. Part 9b - 1

DEP Form No. 62-210.900(1) - Form

	nissions Unit Information Se WC Unit 1	ction 1		
Po	llutant Potential/Estimated Em	issions : Polluta	ant 2	
1.	Pollutant Emitted:	PB		
2.	Total Percent Efficiency of Con-	rol:	%	
3.	Potential Emissions : 0.10	lb/hour	0.42	tons/year
4.	Synthetically Limited? [ ] Yes [X ] No			
5.	Range of Estimated Fugitive/Otl	ner Emissions:	to	tons/year
6.	Emissions Factor : Reference : Permit AG	035-193817		
7.	Emissions Method Code: 5			
8.	Calculations of Emissions:			
	See Appendix G.	<del>.</del> .		
9.	Pollutant Potential/Estimated En	nissions Comment	:	
	FDEP permit emission limitation	used to calculate po	tential emisions.	

III. Part 9b - 2

DEP Form No. 62-210.900(1) - Form

	nissions Unit Information Section WC Unit 1	1		
Po	llutant Potential/Estimated Emissions:	Pollutant	3	
1.	Pollutant Emitted:	NOX		
2.	Total Percent Efficiency of Control:		%	
3.	Potential Emissions: 99.28 lb/	hour	434.86	tons/year
4.	Synthetically Limited? [ ] Yes [X] No			
5.	Range of Estimated Fugitive/Other Emission	ons:	to	tons/year
6.	Emissions Factor: Reference: Permit AO35-193817	,		·
7.	Emissions Method Code: 5			
8.	Calculations of Emissions:			
	See Appendix G			
9.	Pollutant Potential/Estimated Emissions Co	omment :		
	FDEP permit emission limitations used to cal	culate potentia	l emissions.	

III. Part 9b - 3

DEP Form No. 62-210.900(1) - Form

MWC Unit 1			
Pollutant Potential/Estimated Emissions	Pollutant	4	
1. Pollutant Emitted:	PM		
2. Total Percent Efficiency of Control:		%	
3. Potential Emissions : 6.34	lb/hour	27.77	tons/year
4. Synthetically Limited?  [ ] Yes [X] No			
5. Range of Estimated Fugitive/Other Em	issions:	to	tons/year
6. Emissions Factor:  Reference: Permit AO35-19:	3817		,
7. Emissions Method Code: 5			
8. Calculations of Emissions:			
See Appendix G			
9. Pollutant Potential/Estimated Emission			
FDEP permit emission limitation used to	calculate potenti	al emissions.	

III. Part 9b - 4

DEP Form No. 62-210.900(1) - Form

tons/year
to tons/year
·
s. Permit limit is 60 ppmdv at

DEP Form No. 62-210.900(1) - Form

MWC Unit 1			
Pollutant Potential/Estimated Emission	s: Pollutant	6	
1. Pollutant Emitted:	VOC		
2. Total Percent Efficiency of Control:		%	
3. Potential Emissions:			
6.28	lb/hour	27.50	tons/year
4. Synthetically Limited?			
[ ] Yes [X ] No			
5. Range of Estimated Fugitive/Other En	nissions:		
		to	tons/year
6. Emissions Factor:			
Reference: Permit AO35-19	93817		
7. Emissions Method Code: 5			
8. Calculations of Emissions:			
See Appendix G	· .		
9. Pollutant Potential/Estimated Emission	ns Comment :		
FDEP Permit emission limitation used t	o calculate potenti	al emissions.	

III. Part 9b - 6

DEP Form No. 62-210.900(1) - Form

	nissions Unit Information Section WC Unit 1	1			
Po	llutant Potential/Estimated Emissions:	Pollutant	7		
1.	Pollutant Emitted:	FL			
2.	Total Percent Efficiency of Control:		%		
3.	Potential Emissions:  0.46	b/hour	2.03	tons/year	
4.	Synthetically Limited? [ ] Yes [X ] No				
5.	Range of Estimated Fugitive/Other Emiss	sions:	to	tons/yea	r
6.	Emissions Factor : Reference : Permit AO35-1938	17			
7.	Emissions Method Code: 5				
8.	Calculations of Emissions:				
	See Appendix G				
9.	Pollutant Potential/Estimated Emissions (	Comment:			
	FDEP permit emission limitations used to c	calculate potenti	al emissions.		

III. Part 9b - 7

DEP Form No. 62-210.900(1) - Form

	NC Unit 1
Po	llutant Potential/Estimated Emissions: Pollutant 8
1.	Pollutant Emitted: HCL
2.	Total Percent Efficiency of Control: 90.00 %
3.	Potential Emissions:  10.50 lb/hour 45.97 tons/year
4.	Synthetically Limited? [ ] Yes [X ] No
5.	Range of Estimated Fugitive/Other Emissions:  to tons/year
6.	Emissions Factor: Reference: Permit AO35-193817
7.	Emissions Method Code: 5
8.	Calculations of Emissions:
	See Appendix G
9.	Pollutant Potential/Estimated Emissions Comment:
	FDEP permit emission limitation used to calculate potential emissions.

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 1 MWC Unit 1	
Pollutant Potential/Estimated Emissions: Pollutant 9	
1. Pollutant Emitted: H021	
2. Total Percent Efficiency of Control: %	
3. Potential Emissions : lb/hour	tons/year
4. Synthetically Limited? [ ] Yes [X ] No	
5. Range of Estimated Fugitive/Other Emissions:	to tons/year
6. Emissions Factor: Reference: Permit AO35-193817	
7. Emissions Method Code: 5	
8. Calculations of Emissions:	
See Appendix G (Beryllium). Emission factor = 2.00E-07 gr/dscf@11 ton/yr = 2.70E-04. ELSA did not accept these small numbers in Field	-
9. Pollutant Potential/Estimated Emissions Comment:	
FDEP permit emission limitation used to calculate potential emission	s.

III. Part 9b - 9

DEP Form No. 62-210.900(1) - Form

	nissions Unit Information Section WC Unit 1	1		
Po	llutant Potential/Estimated Emissions:	Pollutant	10	
1.	Pollutant Emitted:	H114		
2.	Total Percent Efficiency of Control:	80.00	%	
3.	Potential Emissions : 0.01	lb/hour	0.04	tons/year
4.	Synthetically Limited? [ ] Yes [X ] No			
5.	Range of Estimated Fugitive/Other Emis	ssions:	to	tons/year
6.	Emissions Factor: Reference: Permit AO35-1938	817		
7.	Emissions Method Code: 5			
8.	Calculations of Emissions:			
	See Appendix G (Mercury).	т.		
9.	Pollutant Potential/Estimated Emissions	Comment:		<del></del>
	FDEP permit emission limitation used to o	calculate potent	al emissions.	· · ·

III. Part 9b - 10

DEP Form No. 62-210.900(1) - Form

: Pollutant	1	
СО		
	%	
lb/hour	70.63	tons/year
issions:	to	tons/year
3817		
s Comment:		
calculate potentia	al emissions.	
	: Pollutant CO  lb/hour  issions: 3817	Pollutant 1 CO %  lb/hour 70.63  issions: to

III. Part 9b - 11

**DEP Form No. 62-210.900(1) - Form** 

MWC Unit 2			
Pollutant Potential/Estimated Emissions	: Pollutant	2	
1. Pollutant Emitted:	PB		
2. Total Percent Efficiency of Control:		%	
3. Potential Emissions : 0.10	lb/hour	0.42	tons/year
4. Synthetically Limited? [ ] Yes [X ] No			
5. Range of Estimated Fugitive/Other Emi	ssions:	to	tons/year
6. Emissions Factor : Reference : Permit AO35-193	817		
7. Emissions Method Code: 5			
8. Calculations of Emissions :			
See Appendix G.			
9. Pollutant Potential/Estimated Emissions	Comment:		·
FDEP permit emission limitation used to	calculate potentia	al emissions.	

III. Part 9b - 12

DEP Form No. 62-210.900(1) - Form

	NC Unit 2
Po	llutant Potential/Estimated Emissions: Pollutant 3
1.	Pollutant Emitted: NOX
2.	Total Percent Efficiency of Control: %
3.	Potential Emissions : 99.28 lb/hour 434.86 tons/year
4.	Synthetically Limited? [ ] Yes [X ] No
5.	Range of Estimated Fugitive/Other Emissions:  to tons/year
6.	Emissions Factor: Reference: Permit AO35-193817
7.	Emissions Method Code: 5
8.	Calculations of Emissions:
	See Appendix G
9.	Pollutant Potential/Estimated Emissions Comment:
	FDEP permait emission limitations used to calculate potential emissions.

III. Part 9b - 13

DEP Form No. 62-210.900(1) - Form

	missions Unit Information Section 2 WC Unit 2		
Po	Ilutant Potential/Estimated Emissions: Po	llutant 4	
1.	Pollutant Emitted: PM		•
2.	Total Percent Efficiency of Control:	%	
3.	Potential Emissions : 6.34 lb/hour	r 27.77	tons/year
4.	Synthetically Limited? [ ] Yes [X ] No		
5.	Range of Estimated Fugitive/Other Emissions:	to	tons/year
6.	Emissions Factor : Reference : Permit AO35-193817		
7.	Emissions Method Code: 5		
8.	Calculations of Emissions:		
	See Appendix G		
9.	Pollutant Potential/Estimated Emissions Comm	ent:	
	FDEP permit emission limitation used to calculate	e potential emissions.	

III. Part 9b - 14

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 2 MWC Unit 2		
Pollutant Potential/Estimated Emissions: Pollutant	5	
1. Pollutant Emitted: SO2		
2. Total Percent Efficiency of Control: 70.00	%	
3. Potential Emissions : 21.53 lb/hour	94.29	tons/year
4. Synthetically Limited?  [ ] Yes [X ] No		
5. Range of Estimated Fugitive/Other Emissions:	to	o tons/year
6. Emissions Factor: Reference: Permit AO35-193817		
7. Emissions Method Code: 5		
8. Calculations of Emissions:		
See Appendix G		
9. Pollutant Potential/Estimated Emissions Comment:		
FDEP permit emission limitations used to calculate potentia 12% CO2, 6-hr rolling ave; or 70% reduction, 6-hr rolling ave		e. Permit limit is 60 ppmdv at

III. Part 9b - 15

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section MWC Unit 2	n <u>2</u>		
Pollutant Potential/Estimated Emission	ns: Pollutant	6	
1. Pollutant Emitted:	VOC		
2. Total Percent Efficiency of Control:		%	
3. Potential Emissions : 6.28	lb/hour	27.50	tons/year
4. Synthetically Limited? [ ] Yes [X] No			
5. Range of Estimated Fugitive/Other En	missions:	to	tons/year
6. Emissions Factor: Reference: Permit AO35-1	93817		
7. Emissions Method Code: 5			
8. Calculations of Emissions:			
See Appendix G			
9. Pollutant Potential/Estimated Emission	ons Comment:		
FDEP Permit emission limitation used	to calculate potenti	al emissions.	

III. Part 9b - 16

**DEP Form No. 62-210.900(1) - Form** 

/C Unit 2	omaton Secuc	M1			
lutant Potential/I	Estimated Emissio	ons: Pollutant	7		
Pollutant Emitted	:	FL			
Total Percent Effi	iciency of Control	:	%		
Potential Emission	ns:				
	0.46	lb/hour	2.03	tons/year	
•					
[ ] Yes	[X] No				
Range of Estimate	ed Fugitive/Other I	Emissions:			
			to	tons	/year
		193817			
Emissions Method	i Code: 5				·
Calculations of E	missions :				
See Appendix G			,		;
Pollutant Potentia	l/Estimated Emissi	ions Comment :			
FDEP permit emi	ssion limitations use	ed to calculate pote	ntial emissions.		
	Pollutant Potential/I Pollutant Emitted Total Percent Effi Potential Emission Synthetically Lim [ ] Yes Range of Estimate Emissions Factor Reference Emissions Method Calculations of En See Appendix G Pollutant Potential	Nutant Potential/Estimated Emissic  Pollutant Emitted:  Total Percent Efficiency of Control  Potential Emissions:  0.46  Synthetically Limited?  [ ] Yes [X] No  Range of Estimated Fugitive/Other I  Emissions Factor: Reference: Permit AO35-  Emissions Method Code: 5  Calculations of Emissions:  See Appendix G  Pollutant Potential/Estimated Emissions	Autant Potential/Estimated Emissions: Pollutant Pollutant Emitted: FL  Total Percent Efficiency of Control:  Potential Emissions:  0.46 lb/hour  Synthetically Limited? [ ] Yes [X] No  Range of Estimated Fugitive/Other Emissions:  Emissions Factor: Reference: Permit AO35-193817  Emissions Method Code: 5  Calculations of Emissions:  See Appendix G  Pollutant Potential/Estimated Emissions Comment:	Lutant Potential/Estimated Emissions: Pollutant	Autant Potential/Estimated Emissions: Pollutant

III. Part 9b - 17

DEP Form No. 62-210.900(1) - Form

	nissions Unit Information Section WC Unit 2	2		
Po	llutant Potential/Estimated Emissions:	Pollutant	8	
1.	Pollutant Emitted:	HCL		
2.	Total Percent Efficiency of Control:	90.00	%	
3.	Potential Emissions:	lb/hour	45.97	tons/year
4.	Synthetically Limited? [ ] Yes [X ] No			
5.	Range of Estimated Fugitive/Other Emis	ssions:	to	tons/year
6.	Emissions Factor: Reference: Permit AO35-1938	817		
7.	Emissions Method Code: 5			
8.	Calculations of Emissions:		-	
	See Appendix G	· .		
9.	Pollutant Potential/Estimated Emissions	Comment:		
	FDEP permit emission limitation used to c	alculate potenti	al emissions.	

III. Part 9b - 18

DEP Form No. 62-210.900(1) - Form

MWC Unit 2			
Pollutant Potential/Estimated Emissions	: Pollutant	9	
1. Pollutant Emitted :	H021		
2. Total Percent Efficiency of Control:		%	
3. Potential Emissions:			<del> </del>
	lb/hour	t	ons/year
4. Synthetically Limited?  [ ] Yes [X ] No			
5. Range of Estimated Fugitive/Other Emi	ssions:	to	tons/year
6. Emissions Factor: Reference: Permit AO35-193	817	_	
7. Emissions Method Code: 5			
8. Calculations of Emissions:			
See Appendix G (Beryllium). Emission fa ton/yr = 2.70E-04. ELSA did not accept t			
9. Pollutant Potential/Estimated Emissions	Comment:		
FDEP permit emission limitation used to	calculate potentia	al emissions.	

DEP Form No. 62-210.900(1) - Form

	nissions Unit Information WC Unit 2	Section	2		•
Po	llutant Potential/Estimated I	Emissions :	Pollutant	10	
1.	Pollutant Emitted:		H114		
2.	Total Percent Efficiency of C	Control:		%	
3.	Potential Emissions: 0.0	1 !!	b/hour	0.04	tons/year
4.	Synthetically Limited? [ ] Yes [X ] No				
5.	Range of Estimated Fugitive/	Other Emiss	ions:	to	tons/year
6.	Emissions Factor : Reference : Permi	1 AO35-19381	17		
7.	Emissions Method Code:	5			
8.	Calculations of Emissions:				
	See Appendix G (Mercury).				
9.	Pollutant Potential/Estimated	Emissions (	Comment:		
	FDEP permit emission limitat	ion used to ca	lculate potenti	al emissions.	

III. Part 9b - 20

DEP Form No. 62-210.900(1) - Form

	tivated Carbon Storage Silo				·
Po	llutant Potential/Estimated Emissions	Pollutant	1		
$\int_{}^{1.}$	Pollutant Emitted:	PM			
2.	Total Percent Efficiency of Control:	99.90	%		
3.	Potential Emissions:				
	0.08	lb/hour	0.37	tons/year	
4.	Synthetically Limited?		·		
	[ ] Yes [X] No		÷		
5.	Range of Estimated Fugitive/Other Em	issions:			
				to	tons/year
6.	Emissions Factor :				
	Reference: Process Knowled	ige			
7.	Emissions Method Code: 2				
8.	Calculations of Emissions:				
	See Appendix G.				
9.	Pollutant Potential/Estimated Emission	s Comment :			

III. Part 9b - 21

DEP Form No. 62-210.900(1) - Form

	ne Storage Silo				,	
Po	llutant Potential/Estimated Emissions	: Pollutant	1			
1.	Pollutant Emitted:	PM				
2.	Total Percent Efficiency of Control:	99.90	%			
3.	Potential Emissions :					,
	0.08	lb/hour	0.37		tons/year	
4.	Synthetically Limited?					
	[ ] Yes [X ] No					
5.	Range of Estimated Fugitive/Other Emi	issions:				
				to	tons/year	
6.	Emissions Factor:					
	Reference: Process Knowled	ge				
7.	Emissions Method Code: 2					
8.	Calculations of Emissions:					
	See Appendix G.	:				
9.	Pollutant Potential/Estimated Emissions	s Comment:				

<b>Emissions Unit Information S</b>	Section 1	
MWC Unit 1		-

Pollutant	Information	Section	1

#### Allowable Emissions

1.	Basis for Allowable Emi	ssions Code :	OTHE	R		
2.	Future Effective Date of	Allowable Emi	issions :			
3.	Requested Allowable En	nissions and Ur	nits : 100.00	) рр	mdv @ 7%O2	
4.	Equivalent Allowable Er	nissions :				
		16.13	lb/hour	70.63	tons/year	
5.	Method of Compliance :					
	Continuous monitor					
6.	Pollutant Allowable Emi	ssions Comme	nt (Desc. of Related	Operating M	ethod/Mode):	
1	CO allowable emissions as	s per 62-296.401	(4)(e)(5), F.A.C.			

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b>	1
MWC Unit 1	

Pollutant Information Section	2
-------------------------------	---

#### **Allowable Emissions**

1.	Basis for Allowable Emissions Code:	OTHER			
2.	Future Effective Date of Allowable Emissio	ns:			
3.	Requested Allowable Emissions and Units:	0.00		gr/dscf @12%CO2	
4.	Equivalent Allowable Emissions:				
	0.10	lb/hour	0.42	tons/year	
5.	Method of Compliance:				
	Stack testing				•
6.	Pollutant Allowable Emissions Comment (I	Desc. of Related C	perating	Method/Mode):	
	Basis for allowable emissions is FDEP Permit	AO35-193817. Fut	ure effect	tive date of allowable	

DEP Form No. 62-210.900(1) - Form

	Emissions Unit Information Section 1  MWC Unit 1						
Pol	Pollutant Information Section 3						
All	owable Emissions 1						
1.	Basis for Allowable Emissions Code:	OTHER					
2.	Future Effective Date of Allowable Emission	ons :					
3.	Requested Allowable Emissions and Units	: 385.00	ppr	ndv @ 12% CO2			
4.	Equivalent Allowable Emissions:						
	99.28	lb/hour	434.86	tons/year			
5.	Method of Compliance :						
	Stack testing						
6.	Pollutant Allowable Emissions Comment (	Desc. of Related O	perating Me	thod/Mode):			
	Basis for allowable emissions is FDEP Permit emissions is not applicable.	AO35-193817. Fut	ure effective (	date of allowable			

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

	nissions Unit Information Section 1 WC Unit 1	·		
Po	llutant Information Section 4			
All	owable Emissions 1			
1.	Basis for Allowable Emissions Code:	OTHER		
2.	Future Effective Date of Allowable Emissio	ns:		
3.	Requested Allowable Emissions and Units:	0.02	gı	r/dscf@7%O2
4.	Equivalent Allowable Emissions:			
	6.34	lb/hour	20.27	tons/year
5.	Method of Compliance :		·	
	Stack Testing			
6.	Pollutant Allowable Emissions Comment (D	Desc. of Related O	perating M	ethod/Mode):
	Basis for allowable emissions is FDEP Permit A emissions is not applicable. Allowable emission C02, whichever is less.			

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

	Emissions Unit Information Section 1 MWC Unit 1					
Po	llutant Information Section 5					
Al	lowable Emissions 1					
1.	Basis for Allowable Emissions Code:	OTHER				
2.	Future Effective Date of Allowable Emiss.	ions :				
3.	Requested Allowable Emissions and Units	s: 60.00		ppmdv @ 12% CO2		
4.	Equivalent Allowable Emissions:					
	21.53	lb/hour	94.29	tons/year		
5.	Method of Compliance :					
	Continuous monitor					
6.	Pollutant Allowable Emissions Comment of Permit limit is 60 ppmdv at 12% CO2, 6-hr refective date of allowable emissions is not a	olling ave.; or 70% r		-		

	nissions Unit Information Section 1 WC Unit 1			
Po	llutant Information Section 6			
Al	lowable Emissions 1			
1.	Basis for Allowable Emissions Code:	OTHER		
2.	Future Effective Date of Allowable Emission	ns :		
3.	Requested Allowable Emissions and Units:	70.00		ppmdv @ 12% CO2
4.	Equivalent Allowable Emissions:			
	6.28	lb/hour	27.50	tons/year
5.	Method of Compliance :			<del></del>
	Stack testing			
6.	Pollutant Allowable Emissions Comment (D	Desc. of Related Op	perating	Method/Mode):
	Basis for allowable emissions is FDEP Permit A emissions is not applicable.	AO35-193817. Futu	re effect	ive date of allowable

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

<b>Emissions Unit Information Section</b>	on 1
MWC Unit 1	

Pollutant Information Section	7
Allowable Emissions	

	Basis for Allowable Emissions Code:	OTHER			
2.	Future Effective Date of Allowable Emission	ns:			
3.	Requested Allowable Emissions and Units:	0.00		gr/dscf@12%CO2	
4.	Equivalent Allowable Emissions:				
	0.46	lb/hour	2.03	tons/year	
5.	Method of Compliance :				-
	Stack testing			•	
6.	Pollutant Allowable Emissions Comment (D	esc. of Related Op	erating l	Method/Mode):	
	Basis for allowable emissions is FDEP Permit A emissions is not applicable.	.O35-193817. Futu	re effecti	ve date of allowable	

Emissions Unit Information Section 1 MWC Unit 1	<del>-</del>		
Pollutant Information Section 8			
Allowable Emissions 1		'	
1. Basis for Allowable Emissions Code:	OTHER		
2. Future Effective Date of Allowable Emission	ns:		·
3. Requested Allowable Emissions and Units:	50.00	ppmdv @ 7	% CO2
4. Equivalent Allowable Emissions:			
10.50	lb/hour 4	5.97 tons	/year
5. Method of Compliance :		<del></del>	<del></del>
Stack testing			
6. Pollutant Allowable Emissions Comment (D  HCl allowable emissions: 50 ppmdv at 7% O2, 3	_	_	·

DEP Form No. 62-210.900(1) - Form

	vissions Unit Information Section 1 VC Unit 1	
Po	lutant Information Section 9	
All	owable Emissions 1	
1.	Basis for Allowable Emissions Code: OTHER	
2.	Future Effective Date of Allowable Emissions :	
3.	Requested Allowable Emissions and Units: gr/dscf@12%CO2	
4.	Equivalent Allowable Emissions :	_
	lb/hour tons/year	
5.	Method of Compliance :	_
	Stack testing	
6.	Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):	_
	Basis for allowable emissions is FDEP Permit AO35-193817. See Appendix G. ELSA did not allow input of small numbers in fields above. Future effective date of allowable emissions is not applicable.	

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b>	1
MWC Unit 1	

<b>Pollutant Information</b>	Section	10

Allowable Emissions	1
THE PART OF THE PA	•

1.	Basis for Allowable Emissions Code:	OTHER		
			,	
2.	Future Effective Date of Allowable Emissio	ns:		<del></del>
3.	Requested Allowable Emissions and Units:	70.00		ug/dscm@7%O2
4.	Equivalent Allowable Emissions:			
	0.01	11. /1	0.04	4
l	0.01	lb/hour	0.04	tons/year
5.	Method of Compliance:		<del> </del>	<del></del>
	Stack testing			
6.	Pollutant Allowable Emissions Comment (D	Desc. of Related Or	perating	Method/Mode):
	·	•		,
	Hg allowable emissions: 70 ug/dscm @ 7% O2		per 62-2	96.416(3)(a)(1), F.A.C
	Future effective date of allowable emissions is	not applicable.		

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

Emissions Unit Information Section	2
MWC Unit 2	

Pollutant Information Section	1
Allowable Emissions 1	

1	Basis for Allowable Emissions Code:	OTHER			
1.	Basis for Allowable Limssions code.	OTILK			
	8				
2.	Future Effective Date of Allowable Emission	ons :		<del></del>	
-					
3.	Requested Allowable Emissions and Units:	100.00		opmdv @ 7%O2	
	•				
<u> </u>		- <del></del>			
4.	Equivalent Allowable Emissions:				
	14.10	11 /1	<b>60.60</b>		
	16.13	lb/hour	70.63	tons/year	
-	Made de Consultante				
٥.	Method of Compliance :				
	Cantinuanamanita				
	Continuous monitor				
6	Pollutant Allowable Emissions Comment (I	Desc. of Related Or	nerating N	Method/Mode):	
0.	i oliulait Allowable Ellissions Collineit (1	ocse. of Related Of	berauing is	viction (viole).	
	CO allowable emissions as per 62-296.401(4)(	e)(5)			
	CO altowable etthissions as per 02-270.401(4)(1	- <sub>Д</sub> - <u>J</u> -		•	
1					

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section	2
MWC Unit 2	

1	Basis for Allowable Emissions Code:	OTHER		
1.	basis for Allowable Emissions Code:	OTHER		
l				
2.	Future Effective Date of Allowable Emissio	ns:		
3.	Requested Allowable Emissions and Units:	0.00		gr/dscf@12%CO2
	•			
1	Equivalent Allowable Emissions:	<del></del>		
7.	Equivalent Anowable Emissions.			
	0.10	lb/hour	0.42	tons/year
5.	Method of Compliance:			
	Short harding			
1	Stack testing			
6.	Pollutant Allowable Emissions Comment (I	Desc. of Related Or	perating	Method/Mode):
		1		,
	Basis for allowable emissions is FDEP Permit	AO35-193817. Futu	ire effect	ive date of allowable
	emissions is not applicable.			
1				

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b>	2
MWC Unit 2	

<b>Pollutant Information</b>	Section	3

1

1.	Basis for Allowable Emissions Code: OTHER	
2	Future Effective Date of Allowable Emissions:	
	A dialo Exicolivo Balo of Fino vacio Emissions .	
3.	Requested Allowable Emissions and Units: 385.00 ppmdv @ 12% CO2	
4.	Equivalent Allowable Emissions:	
	99.28 lb/hour 434.86 tons/year	
5.	Method of Compliance :	
	Stack testing	
6.	Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):	- "
	Basis for allowable emissions is FDEP Permit AO35-193817. Future effective date of allowable emissions is not applicable.	

Emissions	Unit Information Section	2
MWC Unit	t 2	

Pollutant	Information	Section	4

1

	Basis for Allowable Emissions Code:	OTHER		
2.	Future Effective Date of Allowable Emission	ons :		
3.	Requested Allowable Emissions and Units	: 0.02	gr	/dscf@7%O2
4.	Equivalent Allowable Emissions:			
	6.34	lb/hour	27.77	tons/year
5.	Method of Compliance :			<del></del>
	Stack Testing			
6.	Pollutant Allowable Emissions Comment (	Desc. of Related C	perating Mo	ethod/Mode):
	Basis for allowable emissions is FDEP Permit emissions is not applicable. Allowable emissions, whichever is less.			

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section	2
MWC Unit 2	

Pollutant Information Section	5

1

	Basis for Allowable Emissions Code:	OTHER		
2.	Future Effective Date of Allowable Emissi	ons :		
3.	Requested Allowable Emissions and Units	: 60.00		ppmdv @ 12% CO2
4.	Equivalent Allowable Emissions:			
	21.53	lb/hour	94.29	tons/year
5.	Method of Compliance :			
	Continuous monitor			·
6.	Pollutant Allowable Emissions Comment (	Desc. of Related O	perating	Method/Mode):
	Permit limit is 60 ppmdv at 12% CO2, 6-hr ro allowable emissions is FDEP Permit AO35-19 not applicable.	•		•

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section	2
MWC Unit 2	

Pollutant Information Section	6
-------------------------------	---

Allowable	Emissions	1	
MUNADIO	Littiogivito		

	<del></del>				
1.	Basis for Allowable Emissions Code:	OTHER			
2.	Future Effective Date of Allowable Emissi	ons :			
3.	Requested Allowable Emissions and Units	70.00	pp	mdv @ 12% CO2	
4.	Equivalent Allowable Emissions:				
	6.28	lb/hour	27.50	tons/year	
5.	Method of Compliance:				
	Stack testing				
6.	Pollutant Allowable Emissions Comment (	Desc. of Related (	Operating Mo	ethod/Mode):	
	Basis for allowable emissions is FDEP Permit emissions is not applicable.	AO35-193817. Fu	ture effective	date of allowable	

<b>Emissions Unit Information Section</b>	2
MWC Unit 2	

Po	llutant Information Section	7			
Al	lowable Emissions 1				
1.	Basis for Allowable Emission	ns Code :	OTHER	· · · · · · · · · · · · · · · · · · ·	
2.	Future Effective Date of Allo	wable Emissio	ons:		
3.	Requested Allowable Emission	ons and Units	0.00		gr/dscf@12%CO2
4.	Equivalent Allowable Emissi	ons:			
		0.46	lb/hour	2.03	tons/year
5.	Method of Compliance :		<u> </u>		
	Stack testing		·		
6.	Pollutant Allowable Emission	ns Comment (I	Desc. of Related O	perating	Method/Mode):
	Basis for allowable emissions i emissions is not applicable.	s FDEP Permit	AO35-193817. Fut	ure effect	ive date of allowable

Emissions Unit Information Section 2 MWC Unit 2
Pollutant Information Section 8
Allowable Emissions 1
1. Basis for Allowable Emissions Code : OTHER
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 50.00 ppmdv @ 7% O2
4. Equivalent Allowable Emissions:
10.50 lb/hour 45.97 tons/year
5. Method of Compliance:
Stack testing  6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):

HCl allowable emissions: 50 ppmdv at 7% O2, 3-hr ave.; or 90% reduction by weight, 1-hr ave. as per 62-296.401(4)(d)(2), F.A.C.

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section  MWC Unit 2	2	
Pollutant Information Section 9		
Allowable Emissions 1		
1. Basis for Allowable Emissions Code:	OTHER	
2. Future Effective Date of Allowable Emiss	ions :	
3. Requested Allowable Emissions and Units	s:	gr/dscf@12%CO2
4. Equivalent Allowable Emissions:		
	lb/hour	tons/year
5. Method of Compliance:		
Stack testing		
6. Pollutant Allowable Emissions Comment	(Desc. of Related Operating	Method/Mode):
Basis for allowable emissions is FDEP Permi numbers in Fields above. Future effective da		• • • • • • • • • • • • • • • • • • •

III. Part 9c - 19

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section MWC Unit 2	n 2		
Pollutant Information Section	10		
Allowable Emissions 1			
1. Basis for Allowable Emissions Co	ode :	OTHER	
2. Future Effective Date of Allowab	le Emissions :		
3. Requested Allowable Emissions	and Units:	70.00	ug/dscm@7%O2
4. Equivalent Allowable Emissions	:		
0.0	l lb/hou	or 0.04	tons/year
5. Method of Compliance:			
Stack testing		•	

III. Part 9c - 20

6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):

Future effective date of allowable emissions is not applicable.

Hg allowable emissions: 70 ug/dscm @7% O2 or 80% removal as per 62-296.416(3)(a)(1), F.A.C.

DEP Form No. 62-210.900(1) - Form

MWC Unit 1	_			
Visible Emissions Limitation: Visible Em	issions Lim	itation	1	
1. Visible Emissions Subtype: VE				
2. Davis for Allowship Oracity . OTTI	(CD			
2. Basis for Allowable Opacity: OTH	EK			
3. Requested Allowable Opacity:		<del></del>	· · · · · · · · · · · · · · · · · · ·	
Normal Conc	litions :	15	%	
Exceptional Cond		20	%	i
Maximum Period of Excess Opacity All		6	min/hour	
4. Method of Compliance :				
Continuous opacity monitor.				
5. Visible Emissions Comment :				
5. Visible Emissions Comment:			• •	
Basis for visible emissions limits is FDEP Pe above are applicable under normal operating shutdowm, and malfunction. However, the fa these emissions.	conditions a	nd are no	t applicable during sta	rtup,

DEP Form No. 62-210.900(1) - Form

Visible Emissions Limitation: Visible Emissions Limitation	nitation	1	
1. Visible Emissions Subtype: VE			
2. Basis for Allowable Opacity: OTHER		<del></del>	
3. Requested Allowable Opacity:			
Normal Conditions: Exceptional Conditions: Maximum Period of Excess Opacity Allowed:  4. Method of Compliance: Continuous opacity monitor.	15 20 6	% min/hour	
5. Visible Emissions Comment:  Basis for visible emissions limits is FDEP Permit AO35- above are applicable under normal operating conditions and malfunctino periods. However, the facility will follow these emissions.	and are n	ot applicable durin	g startup, shutdown,

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

MWC Unit 2

Act	ivated Carbon Storage Silo			•
Vis	ible Emissions Limitation: Visible Emissions Li	mitation	1	
1.	Visible Emissions Subtype: VE			
2.	Basis for Allowable Opacity: OTHER	- <u> </u>		
3.	Requested Allowable Opacity:			
	Normal Conditions:	5	%	
	Exceptional Conditions:	5	%	
	Maximum Period of Excess Opacity Allowed:		min/hour	
4.	Method of Compliance :		<del></del>	`
	Method 9 VE Test performed June 14, 1995.			
5.	Visible Emissions Comment:			
	Permit No. AC35-265176 includes 20% opacity limit. 62-297.620(4), F.A.C.	However	,5% opacity limit in Item #.	3 is per

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

Lime Storage Silo				
Visible Emissions Limitation: Vis	ible Emissions Li	mitation	1	
1. Visible Emissions Subtype :	VE			
2. Basis for Allowable Opacity:	OTHER			
2. Basis for Anowable Opacity	OTHER			
3. Requested Allowable Opacity:			·	
i i	nal Conditions:	5	%	
Exception Maximum Period of Excess Opa	nal Conditions: acity Allowed:	5	% min/hour	
4. Method of Compliance :				
Method 9 VE test performed June 4,	1996.		υ	
5. Visible Emissions Comment:				· · · · · · · · · · · · · · · · · · ·
VE limit in Item #3 is per 62-297.62	0(4), F.A.C.			

**Emissions Unit Information Section** 

MWC Unit 1  Continuous Monitoring System: Continuous Monitor 1		
3. CMS Requirement: OTHER		
4. Monitor Information :		
Manufacturer: Land Combu Model Number: 4500 Serial Number: 30-2055	estion	
5. Installation Date :	01-Jan-1995	
6. Performance Specification Test Date :	21-Feb-1995	
7. Continuous Monitor Comment:		
Located on Emission Unit No. 1 stack. Con	ntinuous monitor required by FDEP Permit AO35-193817.	

DEP Form No. 62-210.900(1) - Form

MWC Unit 1	<del></del>
Continuous Monitoring System: Continuo	ous Monitor 2
1. Parameter Code: O2	2. Pollutant :
3. CMS Requirement: OTHER	
4. Monitor Information :	
Manufacturer: Servomex Model Number: 1400 Serial Number: 04120/B525	
5. Installation Date:	01-Jan-1995
6. Performance Specification Test Date:	21-Feb-1995
7. Continuous Monitor Comment:	
Located at Emisison Unit No.1 economizer. AO35-193817.	. Continuous monitor required by FDEP Permit

**Emissions Unit Information Section** 

Emissions Unit Information Section 1 MWC Unit 1		
Continuous Monitoring System: Continuous M	onitor 3	
1. Parameter Code: O2	2. Pollutant :	
3. CMS Requirement: OTHER		
4. Monitor Information :  Manufacturer : Servomex  Model Number : 1400  Serial Number : 01420/B530		
5. Installation Date : 01-J	an-1995	
6. Performance Specification Test Date: 21-I	Feb-1995	
7. Continuous Monitor Comment:		
Located at Emisison Unit No. 1 stack. Continuous	s monitor required by FDEP Permit AO35-193817.	

DEP Form No. 62-210.900(1) - Form

MV	Emissions Unit Information Section 1 MWC Unit 1  Continuous Monitoring System: Continuous Monitor 4		
1.	Parameter Code: CO2	2. Pollutant :	
3.	CMS Requirement: OTHER		
4.	Monitor Information :	<del></del>	
	Manufacturer: Siemens Model Number: Ultramat 21P Serial Number: X07-013		
5.	Installation Date :	01-Jan-1995	
6.	Performance Specification Test Date :	03-Mar-1995	
7.	Continuous Monitor Comment:		
	Located at the Emission Unit No. 1 economiz AO35-193817.	zer. Continuous monitor required by FDEP Permit	

DEP Form No. 62-210.900(1) - Form

ΜV	MWC Unit 1  Continuous Monitoring System: Continuous Monitor 5		
1.	Parameter Code: CO2	2. Pollutant :	
3.	CMS Requirement: OTHER		
4.	Monitor Information :		
	Manufacturer: Milton-Roy/Fu	ıji	
	Model Number: ZRH-2	·	
	Serial Number: N3P4354T		
5.	Installation Date :	01-Jan-1995	
6.	Performance Specification Test Date :	21-Feb-1995	
7.	Continuous Monitor Comment:		
	Monitor is for carbon dioxide (CO2) and carb stack. Continuous monitor required by FDEI	on monoxide (CO). Located at Emission Unit No. 1 P Permit AO35-193817.	

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 1  MWC Unit 1  Continuous Monitoring System: Continuous Monitor 6		
1. Parameter Code: EM	2. Pollutant :	
3. CMS Requirement: OTHER		
4. Monitor Information :		
Manufacturer: Rosemo Model Number: 8901117 Serial Number: 100008	299000	
5. Installation Date :	01-Jan-1995	
6. Performance Specification Test Date	e: 21-Feb-1995	
7. Continuous Monitor Comment:		
Monitor is for sulfur dioxide (SO2). L	ocated at the Emission Unit No. 1 economizer.	

DEP Form No. 62-210.900(1) - Form

MWC Unit 1  Continuous Monitoring System: Continuous Monitor 7		
1. Parameter Code: EM	2. Pollutant :	
3. CMS Requirement: OTHER		
4. Monitor Information :	<del></del>	
Manufacturer: Rosemou Model Number: 89012929 Serial Number: 1000086		
5. Installation Date :	01-Jan-1995	
6. Performance Specification Test Date :	21-Feb-1995	
7. Continuous Monitor Comment :	<del></del>	
Monitor is for sulfur dioxide (SO2). Loc	cated at the Emission Unit No. 1 stack.	

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 2

MWC Unit 2				
Continuous Monitoring System: Continuous Monitor				
1. Parame	ter Code: VE			2. Pollutant :
3. CMS R	equirement: OTH	ER		L
4. Monito	r Information:			<del></del>
	Manufacturer:	Land Combust	tion	
l	Model Number:	4500		
	Serial Number:	30-2055	·	
5. Installa	tion Date :		01-Jan	n-1995
6. Perform	nance Specification	Γest Date :	21-Fel	b-1995
7. Continu	ious Monitor Comm	ent:		
Located	on Emission Unit No	. 1 stack. Conti	nuous i	monitor required by FDEP Permit AO35-193817.

DEP Form No. 62-210.900(1) - Form

2

MWC Unit 2	<del></del>		
Continuous Monitoring System: Continuous Monitor 2			
1. Parameter Code: O2	2. Pollutant:		
3. CMS Requirement: OTHER			
4. Monitor Information :			
Manufacturer: Servomex Model Number: 1400 Serial Number: 04120/B525			
5. Installation Date:	01-Jan-1995		
6. Performance Specification Test Date:	21-Feb-1995		
7. Continuous Monitor Comment:			
Located at Emisison Unit No.1 economizer. AO35-193817.	. Continuous monitor required by FDEP Permit		

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

Emissions Unit Information Section 2

MWC Unit 2				
Continuous Monitoring System: Continuous Monitor 3				
1. Parameter Code: O2	2. Pollutant :			
3. CMS Requirement: OTHER				
4. Monitor Information :				
Manufacturer: Servomex Model Number: 1400				
Serial Number: 01420/B530				
5. Installation Date:	01-Jan-1995			
6. Performance Specification Test Date:	21-Feb-1995			
7. Continuous Monitor Comment:				
Located at Emisison Unit No. 1 stack. Conf	inuous monitor required by FDEP Permit AO35-193817.			

DEP Form No. 62-210.900(1) - Form

MV	Emissions Unit Information Section 2  MWC Unit 2  Continuous Monitoring System: Continuous Monitor 4		
1.	Parameter Code: CO2	2. Pollutant :	
3.	CMS Requirement: OTHER		
4.	Monitor Information :		
	Manufacturer: Siemens Model Number: Ultramat 21P Serial Number: X07-013		
5.	Installation Date:	01-Jan-1995	
6.	Performance Specification Test Date :	03-Mar-1995	
7.	Continuous Monitor Comment :		
	Located at the Emission Unit No. 1 economiz AO35-193817.	zer. Continuous monitor required by FDEP Permit	

DEP Form No. 62-210.900(1) - Form

	MWC Unit 2  Continuous Monitoring System: Continuous Monitor 5							
1.	Parameter Code: CO2	2. Pollutant :						
3.	CMS Requirement: OTHER							
4.	Monitor Information:							
	Manufacturer: Milton-Roy/ Model Number: ZRH-2 Serial Number: N3P4354T	Fuji						
5.	Installation Date:	01-Jan-1995						
6.	Performance Specification Test Date :	21-Feb-1995						
7.	Continuous Monitor Comment:							
	Monitor is for carbon dioxide (CO2) and ca stack. Continuous monitor required by FD	arbon monoxide (CO). Located at Emission Unit No. 1 DEP Permit AO35-193817.						

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

1.	Parameter Code: EM	2. Pollutant :
3.	CMS Requirement: OTHER	
4.	Monitor Information :	
	Manufacturer: Rosemount	
	Model Number: 890111299000	
	Serial Number: 1000087	
5.	Installation Date :	01-Jan-1995
6.	Performance Specification Test Date :	21-Feb-1995
7.	Continuous Monitor Comment:	

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

MV	WC Unit 2	
Co	ntinuous Monitoring System: Continuo	ous Monitor 7
1.	Parameter Code: EM	2. Pollutant :
3.	CMS Requirement: OTHER	
4.	Monitor Information :	
	Manufacturer: Rosemount	
	Model Number: 89012929900	)0
	Serial Number: 1000086	
5.	Installation Date:	01-Jan-1995
6.	Performance Specification Test Date :	21-Feb-1995
7.	Continuous Monitor Comment:	
	Monitor is for sulfur dioxide (SO2). Locate	d at the Emission Unit No. 1 stack.

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 2

# K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Emis	Emissions Unit Information Section						
MWC	MWC Unit 1						
PSD Increment Consumption Determination							
1. In	crement Consuming for Particulate Matter or Sulfur Dioxide?						
[X]	The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.						
[ ]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.						
[ ]	The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.						
[ ]	For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.						
[ ]	None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.						

III. Part 12 - 1

DEP Form No. 62-210.900(1) - Form

2.	2. Increment Consuming for Nitrogen Dioxide?								
{ X	[ ]	The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.							
]	]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.							
ĺ	] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.							•	
{	]	For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.							
[	None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.								
							•	•	
3.	Ir	ncrement Cons	uming/Ex	panding Code:					
		PM:	С	SO2:	С	NO2	: C		
4.	4. Baseline Emissions:								
		PM:		lb/hour			tons/yea		
		SO2 : NO2 :		lb/hour			tons/yea		
5.	P	SD Comment	·			<del></del>			

Baseline emissions for PM, SO2 and NO2 are not known and therefore have been left blank in

III. Part 12 - 2

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

## K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Emi	Emissions Unit Information Section 2						
MW	MWC Unit 2						
PSI	PSD Increment Consumption Determination						
1. I	ncrement Consuming for Particulate Matter or Sulfur Dioxide?						
[X]	The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.						
[ ]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.						
[ ]	The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.						
[]	For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.						
[ ]	None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.						

III. Part 12 - 4

DEP Form No. 62-210.900(1) - Form

2.	2. Increment Consuming for Nitrogen Dioxide?									
[ X	[X] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emunit consumes increment.									
[	]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.								
[	]	emissions unit	began initial o	peration a	ıfter Februai		ujor source, and the efore March 28, 1988. If ment.			
[	]	•	•	_	•	begin) initial ope sions unit consun	ration after March 28, nes increment.			
[	None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.									
3.	Ir	crement Consur	ning/Expandir	ng Code :						
		<b>PM</b> :	С	SO2:	С	NO2:	С			
4.	В	aseline Emission	ns:			<del></del>				
		PM:		lb/hour			tons/year			
:		SO2:		lb/hour			tons/year			
•		NO2:					tons/year			
;							· · · · · · · · · · · · · · · · · · ·			
5.	P	SD Comment:				·.				
	В	aseline emissions	for PM, SO2 a	nd NO2 ar	e not known	and therefore have	e been left blank in			
				III. Part	12 - 5		······			
		Form No. 62-21	10.900(1) - Foi	m						
CI	Effective: 3-21-96									

#### K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

3

Activa	Activated Carbon Storage Silo							
PSD ]	Increment Consumption Determination							
1. Inc	1. Increment Consuming for Particulate Matter or Sulfur Dioxide?							
	The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.							
	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.							
	The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.							
• •	For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.							
[ ]	None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.							

III. Part 12 - 7

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

2.	2. Increment Consuming for Nitrogen Dioxide?									
[	]	The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.								
[ X	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.									
[	}	emissions unit	began initial o	peration a	ıfter Febru	fied as an EPA m lary 8, 1988, but b lit consumes incre	efore March			
[	]	• •		_	•	l begin) initial ope ssions unit consu		•		
[	] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.									
3.	In	crement Consu	ming/Expandir	ng Code :						
		PM:	С	SO2:	C	NO2 :	С			
4.	4. Baseline Emissions :									
	PM: lb/hour tons/year SO2: lb/hour tons/year NO2: tons/year									
5.	P	SD Comment:								
	Ва	aseline emissions	s are not known			een left blank in acc	cordance with l	FDEP		
				III. Part	17 - 8					

DEP Form No. 62-210.900(1) - Form Effective : 3-21-96

insturctions.

III. Part 12 - 9

DEP Form No. 62-210.900(1) - Form

# K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Emissions Unit Information Section 4					
Li	Lime Storage Silo				
P	SD	Increment Consumption Determination			
1.	In	crement Consuming for Particulate Matter or Sulfur Dioxide?			
[	[ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PS review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.				
[2	<b>K</b> ]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.			
[	]	The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.			
[	[ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.				
[	]	None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.			

III. Part 12 - 10

**DEP Form No. 62-210.900(1) - Form** 

2.	2. Increment Consuming for Nitrogen Dioxide?						
[	]	The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.					
[ X	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.						
[	]	The facility addressed in thi emissions unit began initial so, baseline emissions are ze	operation a	ifter Fe	bruary 8, 1988	B, but bef	ore March 28, 1988. If
I	]	For any facility, the emissio 1988. If so, baseline emissi	_		- '	_	
[	] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.						
3.	Ir	ncrement Consuming/Expand	ing Code :				
		PM: C	SO2:	С		NO2 :	С
4.	Baseline Emissions:						
		PM:	lb/hour		,	1	tons/year
		SO2 : NO2 :	lb/hour				tons/year tons/year
5.	P	SD Comment:					
	В	aseline emissions are not know	n and theref	ore hav	e been left blan	k in accor	dance with FDEP
İ	IIIPart 12 - 11						

DEP Form No. 62-210.900(1) - Form Effective : 3-21-96

insturctions.

III. Part 12 - 12

DEP Form No. 62-210.900(1) - Form

# K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Emissions Unit Information Section 5				
Coc	olir	ng Tower ·		
PSD Increment Consumption Determination				
1.	In	crement Consuming for Particulate Matter or Sulfur Dioxide?		
[ ]	]	The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.		
	]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.		
[ ]	}	The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.		
	]	For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.		
	]	None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.		

III. Part 12 - 13

**DEP** Form No. 62-210.900(1) - Form

2.	. Increment Consuming for Nitrogen Dioxide?				
[	1	The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.			
[	] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.				C.,
[	]	emissions unit began ir	nitial operation after Febr	sified as an EPA major source, and the ruary 8, 1988, but before March 28, 1988, unit consumes increment.	. If
[	]	•	_ ,	ill begin) initial operation after March 28, nissions unit consumes increment.	,
[	] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.				
,					<u>-</u>
3.	In	acrement Consuming/Ex	panding Code:		
		PM:	SO2:	NO2:	
4.	Baseline Emissions :				
		PM:	lb/hour	tons/year	
		SO2:	lb/hour	tons/year	
	NO2: tons/year				
5.	P	SD Comment:			
	U	nregulated emission unit.		•	

III. Part 12 - 14

DEP Form No. 62-210.900(1) - Form

III. Part 12 - 15

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section

MWC Unit 1				
Supplemental Requirements for All Applications				
1. Process Flow Diagram:	Appendix C			
2. Fuel Analysis or Specification :	Appendix I			
3. Detailed Description of Control Equipment:	Appendix J			
4. Description of Stack Sampling Facilities :	Appendix K			
5. Compliance Test Report :	March 14, 1996			
6. Procedures for Startup and Shutdown:	Appendix I			
7. Operation and Maintenance Plan:	See Section 1			
8. Supplemental Information for Construction Permit Application:	NA			
9. Other Information Required by Rule or Statue :	NA			
Additional Supplemental Requirements for Category I Application	s Only			
10. Alternative Methods of Operations:	NA			
11. Alterntive Modes of Operation (Emissions Trading):	NA			

III. Part 13 - 1

DEP Form No. 62-210.900(1) - Form

12. Enhanced Monitoring	Plan:	NA
13. Identification of Additional Applicable Requirements :		Appendix L,M
14. Acid Rain Application	(Hard-copy Required):	
NA Acid Rain Part - Phase II (For		n No. 62-210.900(1)(a))
NA Repowering Extension Plan (F		orm No. 62-210.900(1)(a)1.)
NA New Unit Exemption (Form N		o. 62-210.900(1)(a)2.)
NA	Retired Unit Exemption (Form	No. 62-210.900(1)(a)3.)

2

Supplemental Requirements for All Applications				
1. Process Flow Diagram:	Appendix C			
2. Fuel Analysis or Specification:	Appendix I			
3. Detailed Description of Control Equipment:	Appendix J			
4. Description of Stack Sampling Facilities:	Appendix K			
5. Compliance Test Report :	March 14, 1996			
6. Procedures for Startup and Shutdown:	Appendix I			
7. Operation and Maintenance Plan:	See Section 1			
8. Supplemental Information for Construction Permit Application :	NA			
9. Other Information Required by Rule or Statue :	NA			
Additional Supplemental Requirements for Category I Application	s Only			
10. Alternative Methods of Operations:	NA			
11. Alterntive Modes of Operation (Emissions Trading):	NA			

III. Part 13 - 3

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

**Emissions Unit Information Section** 

MWC Unit 2

12. Enhanced Monitorin	g Plan:	NA
13. Identification of Add	litional Applicable Requirements :	Appendix L,M
14. Acid Rain Application	on (Hard-copy Required):	
NA	Acid Rain Part - Phase II (Form	n No. 62-210.900(1)(a))
NA .s	form No. 62-210.900(1)(a)1.)	
NA	New Unit Exemption (Form No	o. 62-210.900(1)(a)2.)
NA	Retired Unit Exemption (Form	No. 62-210.900(1)(a)3.)
·		

3

**Emissions Unit Information Section** 

**DEP Form No. 62-210.900(1) - Form** 

Effective: 3-21-96

**Activated Carbon Storage Silo** 

Supplemental Requirements for All Applications				
1. Process Flow Diagram:	Appendix C			
2. Fuel Analysis or Specification:	NA			
3. Detailed Description of Control Equipment:	Appendix J			
4. Description of Stack Sampling Facilities :	NA			
5. Compliance Test Report :	June 1995			
6. Procedures for Startup and Shutdown:	NA			
7. Operation and Maintenance Plan:	NA			
8. Supplemental Information for Construction Permit Application :	NA			
9. Other Information Required by Rule or Statue :	NA			
Additional Supplemental Requirements for Category I Application	ns Only			
10. Alternative Methods of Operations:	NA			
11. Alterntive Modes of Operation (Emissions Trading):	NA			

III. Part 13 - 5

12. Enhanced I	Monitoring Plan :	NA
13. Identificati	on of Additional Applicable Requirements:	NA
14. Acid Rain	Application (Hard-copy Required):	
NA	Acid Rain Part - Phase II (F	Form No. 62-210.900(1)(a))
NA Repowering Extension Plan (		n (Form No. 62-210.900(1)(a)1.)
NA	. New Unit Exemption (Form	n No. 62-210.900(1)(a)2.)
NA	Retired Unit Exemption (Fo	orm No. 62-210.900(1)(a)3.)

Supplemental Requirements for All Applications				
1. Process Flow Diagram:	Appendix C			
2. Fuel Analysis or Specification:	NA			
3. Detailed Description of Control Equipment:	Appendix J			
4. Description of Stack Sampling Facilities :	NA			
5. Compliance Test Report :	June 1996			
6. Procedures for Startup and Shutdown:	NA			
7. Operation and Maintenance Plan:	NA			
8. Supplemental Information for Construction Permit Application:	NA			
9. Other Information Required by Rule or Statue :	NA			
Additional Supplemental Requirements for Category I Application	as Only			
10. Alternative Methods of Operations :	NA			
11. Alterntive Modes of Operation (Emissions Trading):	NA			

III. Part 13 - 7

DEP Form No. 62-210.900(1) - Form

**Emissions Unit Information Section** 

Lime Storage Silo

12. Enhanced Monitorin	ng Plan:	NA
13. Identification of Additional Applicable Requirements: NA		
14. Acid Rain Applicati	on (Hard-copy Required):	
NA Acid Rain Part - Phase II (I		orm No. 62-210.900(1)(a))
NA	Repowering Extension Plan	sion Plan (Form No. 62-210.900(1)(a)1.)
NA	New Unit Exemption (Form	No. 62-210.900(1)(a)2.)
NA ·	Retired Unit Exemption (For	rm No. 62-210.900(1)(a)3.)

DEP Form No. 62-210.900(1) - Form Effective : 3-21-96

**Emissions Unit Information Section** 5

III. Part 13 - 9

DEP Form No. 62-210.900(1) - Form

12.	Enhanced	Monitoring	Plan	:
-----	----------	------------	------	---

- 13. Identification of Additional Applicable Requirements :
- 14. Acid Rain Application (Hard-copy Required):

Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))

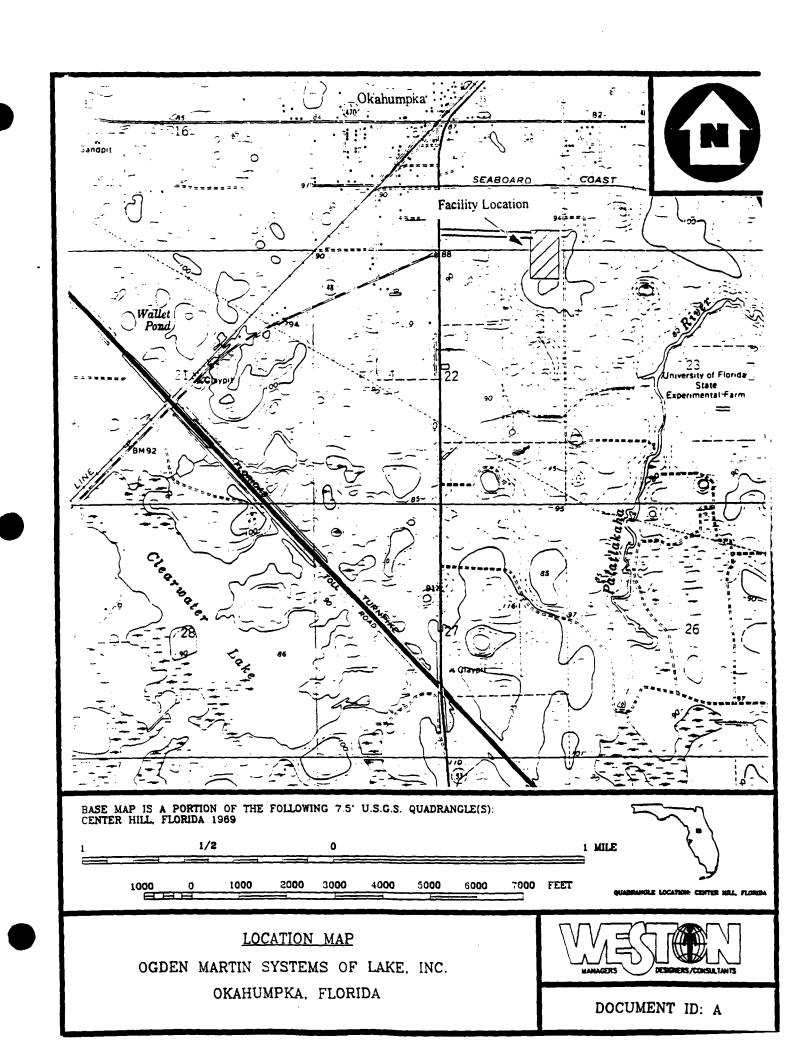
Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)

New Unit Exemption (Form No. 62-210.900(1)(a)2.)

Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)

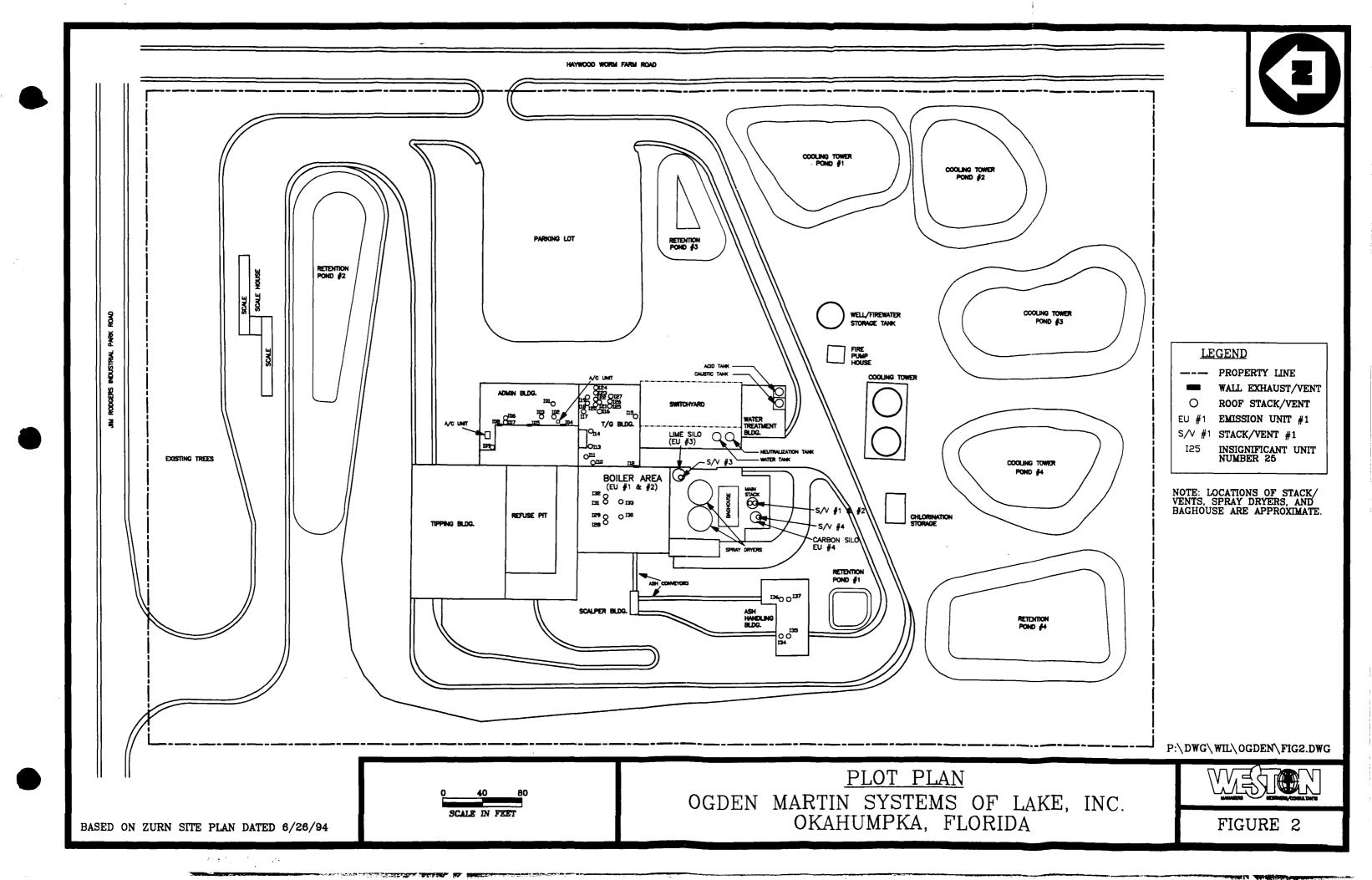
#### APPENDIX A

**Facility Location Map** 



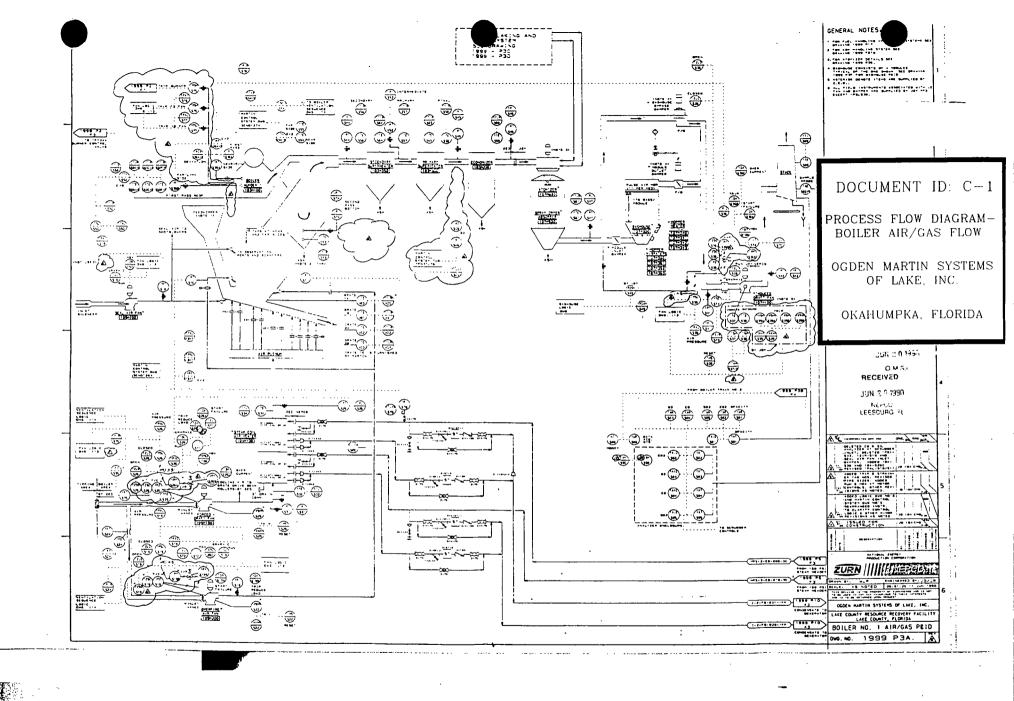
#### APPENDIX B

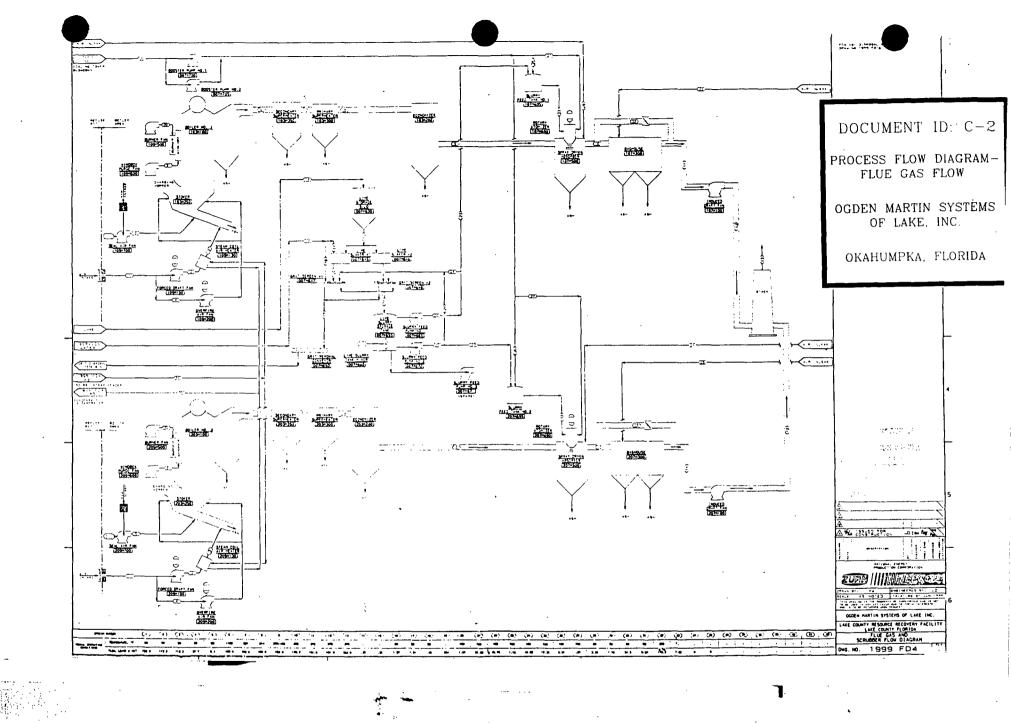
**Facility Plot Plan** 

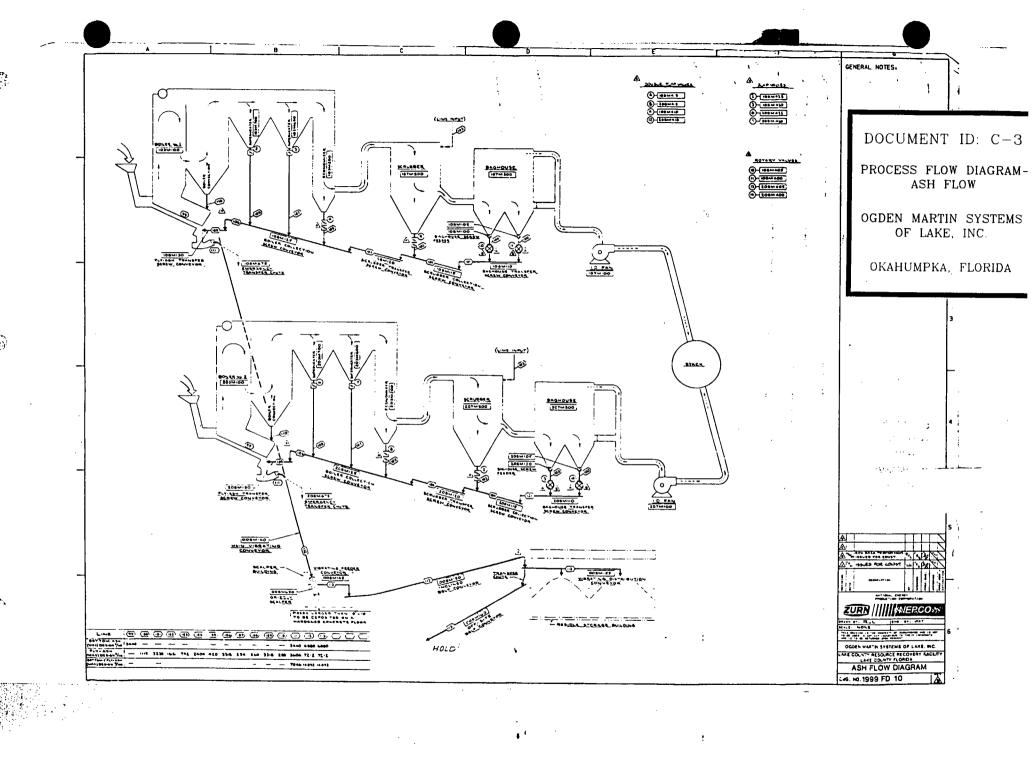


#### APPENDIX C

**Process Flow Diagrams** 







#### APPENDIX D

**Fugitive Emissions Control Measures** 

# <u>Precautions to Prevent Emissions of Unconfined Particulate Matter/Fugitive Emissions</u> <u>Identification</u>

There are no significant sources of fugitive emissions at the facility. Minor amounts of fugitive emissions could potentially be associated with the ash generated at the facility. All reasonable precautions are taken to control/prevent emissions of unconfined particulate matter and fugitive emissions at the facility. These include the following:

- All roads and parking areas are paved, and unpaved areas are landscaped with plants or vegetation.
- Application of water would be performed as required during any demolition, grading, construction, or land clearing operations.
- Potential emissions of particulate matter from Emission Unit Nos. 1, 2, 3, and 4 are controlled using control devices as detailed in this permit application.
- Potential emissions of particulate matter from the ash generated at the facility is controlled as detailed in the *Lake County Resource Recovery Facility Ash Residue Management Plan*.

#### APPENDIX E

List of Insignificant Activities

# Attachment E Summary of Insignificant Activities/Emission Units Ogden Martin Systems of Lake, Inc.

Insignificant			
Unit	Diameter		
Stack/Vent ID	(inches)	Description	Regulated Air Pollutants
101	12	Admin. Bldg. Roof Exhaust	None
102	3	Bathroom/Sewer Vent	None
103	2	Bathroom/Sewer Vent	None
104	5' x 3'	Admin. Bldg. Passive Wall Vent	None
105	24 x 24	Passive Wall Vent	None
106	3	Bathroom/Sewer Vent	None
107	2	Bathroom/Sewer Vent	None
108	12 x 12	Battery Storage Room Wall Exhaust	None
109	1	Bathroom/Sewer Vent	None
I10 💉	6	T/G Building Steam Release Vent	None
111	36 x 36	Room Exhaust	None
112	12	Boiler Flash Tank Steam Vent	None
113	48	T/G Building Room Exhaust	None
114	2	Turbine Air Ejector Vent	None
115	6	T/G Building Steam Release Vent	None
116	48	T/G Building Room Exhaust	None
117	14	T/G Building Steam Release Vent	None
118	10	T/G Building Steam Release Vent	None
119	6	T/G Building Steam Release Vent	None
120	2	T/G Building Steam Release Vent	None
121	6		
		T/G Building Steam Release Vent	None
122	10	T/G Building Steam Release Vent	None
123	6	T/G Building Steam Release Vent	None
124	6	T/G Building Steam Release Vent	None
125	6	T/G Building Steam Release Vent	None
126	2	T/G Building Steam Release Vent	None
127	6	T/G Building Steam Release Vent	None
128	8	Superheater Steam Relief Valve	None
129	6	Superheater Steam Relief Valve	None
130	2	Superheater Steam Relief Valve	None
131	6	Superheater Steam Relief Valve	None
132	8	Soot Blower Steam Relief Valve	None
133	2	Soot Blower Steam Relief Valve	None
134	24	Ash Handling Building Roof Vent	Particulates - Insignificant Activity
135	24	Ash Handling Building Roof Vent	Particulates - Insignificant Activity
136	24	Ash Handling Building Roof Vent	Particulates - Insignificant Activity
137	24	Ash Handling Building Roof Vent	Particulates - Insignificant Activity
		Ash Conveyors	Particulates - Insignificant Activity
		Safety-Kleen Degreaser (1)	VOCs - Insignificant Activity
		Acetylene Torches (2)	VOCs - Insignificant Activity
		Electric Welders (2)	VOCs - Insignificant Activity
	·	200-gal Diesel Tank	VOCs - Insignificant Activity
		500-gal Deisel Tank	VOCs - Insignificant Activity
		185 HP Diesel-fired Fire Water Pump	Criteria Pollutants - Insignificant Activity
		CEM Vent Lines	Criteria Pollutants - Insignificant Activity

#### APPENDIX F

Compliance Report

#### Compliance Report and Certification

#### **Compliance Report**

As documented in this permit application, all emission units at the facility are currently in compliance with all applicable requirements. Thus no compliance plan or compliance schedule is required. See the attached letter dated November 29, 1996 concerning the permit status for Emission Unit No. 4 (Lime Silo).

#### **Compliance Certification**

Compliance certification by the responsible official will be provided to the FDEP annually throughout the permit term. The following compliance certification statement is included to certify to the truth, accuracy, and completeness of the above Compliance Report:

I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Gary K. Crane, Ph.D.

Executive Vice President

Glilgs

Date

TO

#### OGDEN MARTIN SYSTEMS OF LAKE, INC.

3830 ROGERS INDUSTRIAL PARK ROAD OKAHUNIPKA FL 34782

Tāl: (904) 365-1611 FAX: (904: 565-6359)



November 29, 1995

Mr. John Brown Title V Air Permitting Section Florida Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399

Dear Mr. Brown:

In accordance with Rule 62-210.300(4)(a) of the Florida Administrative Code, please be advised that Ogden Martin Systems of Lake, Inc., is exercising the "exemption from permitting" provided therein for a lime storage silo located at the facility. The silo is not subject to PSD, NSR, NSPS. NESHAP, BACT, or RACT, and is therefore qualified for this exemption. As required in the above cited regulation, this currently un-permitted air emission source will be included as an emissions unit in the facility's 62-213 (Title V) permit application. This letter serves as the Department's authorization to inspect this emission unit at the Department's discretion.

If additional information is necessary, please do not hesitate to contact me at (904) 365-1611.

Sincerely,

Jason M. Gorrie

Environmental Engineer

Ogden Martin Systems of Lake, Inc.

Jim Pennington, FDEP Air Compliance cc: Charles Collins, FDEP Central District



### Department of Environmental Protection

Lawton Chiles Governor Twin Towers Office Building 2600 Blair Stone Road Tallahasses, Florida 32399-2400

Virgino & Wintheresi Secretary

December 1, 1995

Mr. Jason M. Gorrie Environmental Engineer Ogden Martin Systems of Lake, Inc. 3830 Rogers Industrial Park Road Okahumpka, Plorida 34762

Dear Mr. Gorrie:

This letter is to acknowledge receipt of your letter of November 29 regarding temporary exemption of a lime storage site.

The letter will be retained for reference during the Title V permitting process.

Please contact me at the letterhead address or by calling (904) 488-1344 if you have any questions.

Sincerely,

John C. Brown, Jr., P.E.

Administrator

Air Permitting and Standards

JCB/sk

RECEIVED
DEC - 1 No.

#### APPENDIX G

**Emissions Calculations** 

### Appendix G Table G-1

### Maximum Potential Emissions Calculations Ogden Martin Systems of Lake, Inc.

**Emission Unit No:** 

1 (MWC Unit No. 1)

Max. Flow rate:

43,200 dscf/min (@ 9% O<sub>2</sub>, 10% CO<sub>2</sub>) (See Form III. Part 7a-1)

Solid Waste Heat Content:

5000 Btu/lb

Solid Throughput:

288 ton/day (Permit limit)

Hours of Operation:

8760 hr/yr (Maximum potential)

	Peri	mit Emission Limit	Maximum Potential Emissions	
Pollutant	Quantity	Units	(lb/hr) <sup>a</sup>	(ton/yr) <sup>b</sup>
PM/PM10	0.02	gr/dscf @ 7% O₂	6.34	27.77
PM/PM10	0.015	gr/dscf @ 12% CO₂	4.63	20.27
SO₂	60	ppmdv @ 12% CO₂	21.53	94.29
NO <sub>x</sub>	385	ppmdv @ 12% CO <sub>2</sub>	99.28	434.86
СО	100	ppmdv @ 7% O₂	16.13	70.63
VOC	70	ppmdv @ 12% CO₂	6.28	27.50
Lead	3.10E-04	gr/dscf @ 12% CO₂	0.10	0.42
Fluoride	1.50E-03	gr/dscf @ 12% CO₂	0.46	2.03
Beryllium	2.00E-07	gr/dscf @ 12% CO₂	6.17E-05	2.70E-04
Mercury	70	ug/dscm @ 7% O₂	9.70E-03	4.25E-02
HCI	50	ppmdv @ 7% O <sub>2</sub>	10.50	45.97

a lb/hr emissions calculated as follows:

For PM/PM10 corrected to 7% O<sub>2</sub>:

 $lb/hr = gr/dscf \times 43,200 dscf/min \times 1 lb/7000 gr \times 60 min/hr \times (20.9-9% O<sub>2</sub>)/(20.9-7% O<sub>2</sub>)$ 

For PM/PM10, lead, flouride, beryllium corrected to 12% CO<sub>2</sub>:

 $lb/hr = gr/dscf \times 43,200 dscf/min \times 1 lb/7000 gr \times 60 min/hr \times (10% CO<sub>2</sub>)/(12% CO<sub>2</sub>)$ 

For Mercury corrected to 7% O<sub>2</sub>:

 $lb/hr = ug/dscm \times 1m^3/35.29 \text{ ft}^3 \times 1 lb/4.54E+08 ug \times 43,200 dscf/min}$ 

 $\times$  60 min/hr  $\times$  (20.9-9%O<sub>2</sub>/(20.9-7% O<sub>2</sub>))

For CO and HCI:

lb/hr = ppmdv x  $1/10^6$  x 1 lb mol/385.3 scf x Mol. Wt. lb/lb mol x 43,200 dscf/min x 60 min/hr x  $(20.9-9\%O_2/(20.9-7\%O_2))$ 

For SO<sub>2</sub>, NO<sub>x</sub>, and VOC:

lb/hr = ppmdv x  $1/10^6$  x 1 lb mol/385.3 scf x Mol. Wt. lb/lb mol x 43,200 dscf/min x 60 min/hr x  $(10\% \text{ CO}_2/(12\% \text{ CO}_2))$ 

Molecular weight for VOC = 16 (methane).

The above calculations assume that exhaust from Emission Unit Nos. 1 and 2 average  $9\% O_2$  and  $10\% CO_2$ .

b ton/yr emissions calculated as: ton/yr = lb/hr x 8760 hr/yr x 1 ton/2000 lb

#### Appendix G Table G-2

### Maximum Potential Emissions Calculations Ogden Martin Systems of Lake, Inc.

**Emission Unit No:** 

2 (MWC Unit No. 2)

Max. Flow rate:

43,200 dscf/min (@ 9% O2, 10% CO2) (See Form III. Part 7a-3)

Solid Waste Heat Content:

5000 Btu/lb

Solid Waste Throughput:

288 ton/day (Permit limit)

Hours of Operation:

8760 hr/yr (Maximum potential)

	Permit Emission Limit		Maximum Potential Emissions	
Pollutant	Quantity	Units	(lb/hr) <sup>a</sup>	(ton/yr) <sup>b</sup>
PM/PM10	0.02	gr/dscf @ 7% O₂	6.34	27.77
PM/PM10	0.015	gr/dscf @ 12% CO <sub>2</sub>	4.63	20.27
SO <sub>2</sub>	60	ppmdv @ 12% CO₂	21.53	94.29
NO <sub>x</sub>	385	ppmdv @ 12% CO₂	99.28	434.86
CO	100	ppmdv @ 7% O <sub>2</sub>	16.13	70.63
VOC	70	ppmdv @ 12% CO₂	6.28	27.50
Lead	3.10E-04	gr/dscf @ 12% CO₂	0.10	0.42
Fluoride	1.50E-03	gr/dscf @ 12% CO₂	0.46	2.03
Beryllium	2.00E-07	gr/dscf @ 12% CO₂	6.17E-05	2.70E-04
Mercury	70	ug/dscm @ 7% O₂	9.70E-03	4.25E-02
HCI	50	ppmdv @ 7% O₂	10.50	45.97

<sup>&</sup>lt;sup>a</sup> lb/hr emissions calculated as follows:

For PM/PM10 corrected to 7% O<sub>2</sub>:

lb/hr = gr/dscf x 43,200 dscf/min x 1 lb/7000 gr x 60 min/hr x  $(20.9-9\% O_2)/(20.9-7\% O_2)$ 

For PM/PM10, lead, flouride, beryllium corrected to 12% CO2:

 $lb/hr = gr/dscf \times 43,200 dscf/min \times 1 lb/7000 gr \times 60 min/hr \times (10% CO<sub>2</sub>)/(12% CO<sub>2</sub>)$ 

For Mercury corrected to 7% O<sub>2</sub>:

lb/hr = ug/dscm x 1m<sup>3</sup>/35.29 ft<sup>3</sup> x 1 lb/4.54E+08 ug x 43,200 dscf/min x 60 min/hr x  $(20.9-9\%O_2/(20.9-7\%O_2))$ 

For CO and HCI:

lb/hr = ppmdv x  $1/10^6$  x 1 lb mol/385.3 scf x Mol. Wt. lb/lb mol x 43,200 dscf/min x 60 min/hr x  $(20.9-9\%O_2/(20.9-7\%O_2))$ 

For SO<sub>2</sub>, NO<sub>x</sub>, and VOC:

lb/hr = ppmdv x  $1/10^6$  x 1 lb mol/385.3 scf x Mol. Wt. lb/lb mol x 43,200 dscf/min x 60 min/hr x  $(10\% \text{ CO}_2/(12\% \text{ CO}_2))$ 

Molecular weight for VOC = 16 (methane).

The above calculations assume that exhaust from Emission Unit Nos. 1 and 2 average  $9\% O_2$  and  $10\% CO_2$ .

b ton/yr emissions calculated as: ton/yr = lb/hr x 8760 hr/yr x 1 ton/2000 lb

#### Appendix G Table G-3

## Maximum Potential Emissions Calculations Ogden Martin Systems of Lake, Inc.

Emission Unit No:

3 (Activated Carbon Storage Silo)

Hours of Operation:

8760 hr/yr (Maximum potential)

PM Emission Factor:

0.015 gr/dscf

Baghouse Removal Efficiency (%):

99.9

#### PM Potential Emissions:

 $lb/hr = (0.015 gr/dscf) \times 650 dscf/min \times 60 min/hr \times 1 lb/7000 gr$ = 0.0836 lb/hr PM

 $ton/yr = 0.0836 lb/hr \times 8,760 hr/yr \times 1 ton/2000 lb = 0.366 ton/yr PM$ 

# Appendix G Table G-4 Maximum Potential Emissions Calculations Ogden Martin Systems of Lake, Inc.

Emission Unit No:

4 (Lime Storage Silo)

Hours of Operation:

8760 hr/yr (Maximum potential)

PM Emission Factor:

0.015 gr/dscf

Baghouse Removal Efficiency (%):

99.9

#### PM Potential Emissions:

 $lb/hr = (0.015 gr/dscf) \times 650 dscf/min \times 60 min/hr \times 1 lb/7000 gr = 0.0836 lb/hr PM$ 

 $ton/yr = 0.0836 lb/hr \times 8,760 hr/yr \times 1 ton/2000 lb = 0.366 ton/yr PM$ 

#### APPENDIX H

Title V Core List

```
<TITLE>Florida DEP Air Resource Management</TITLE>
<H1>Florida Air Resource Management</H1>
<H1>Title V Facility Requirements</H1>
<hr>
>
[Note: The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations"
for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list
of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced
in its entirety, or with specific exceptions. The Department may periodically update the Title V Core
List.1
<P>
Federal: (description)
40 CFR 61, Subpart M: NESHAP for Asbestos.
40 CFR 82: Protection of Stratospheric Ozone.
40 CFR 82, Subpart A: Production and Consumption Controls.
40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).
40 CFR 82, Subpart C: Ban on Nonessential Products Containing Class I Substances.
40 CFR 82. Subpart E: The Labeling of Products Using Ozone-Depleting Substances.
40 CFR 82, Subpart F: Recycling and Emissions Reduction.
40 CFR 82, Subpart G: Safe Alternatives Policy.
</PRE>
<P>
State: (description)
CHAPTER 62-4, F.A.C.: PERMITS, effective 11-23-94
62-4.030, F.A.C.: General Prohibition.
62-4.040, F.A.C.: Exemptions.
62-4.060, F.A.C.: Consultation.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.
62-4.080, F.A.C.: Modification of Permit Conditions.
62-4.090, F.A.C.: Renewals.
62-4.100, F.A.C.: Suspension and Revocation.
62-4.110, F.A.C.: Financial Responsibility.
62-4.120, F.A.C.: Transfer of Permits.
62-4.130, F.A.C.: Plant Operation - Problems.
62-4.160, F.A.C.: Permit Conditions.
CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE,
effective 11-28-93
62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.
>
CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL
REQUIREMENTS, effective 11-23-94
```

62-210.300, F.A.C.: Permits Required.

```
62-210.300(1), F.A.C.: Air Construction Permits.
62-210.300(2), F.A.C.: Air Operation Permits.
62-210.300(3), F.A.C.: Exemptions.
62-210.300(4), F.A.C.: Temporary Exemptions.
62-210.300(5), F.A.C.: Notification of Startup.
62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to
                    Operation Permits for Title V Sources.
62-210.360, F.A.C.: Administrative Permit Corrections.
62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-210.400. F.A.C.: Emission Estimates.
62-210.650, F.A.C.: Circumvention.
62-210.700. F.A.C.: Excess Emissions.
62-210.900. F.A.C.: Forms and Instructions.
62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.
62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and
           Instructions.
>
CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION
REVIEW, effective 11-23-94
62-212.700, F.A.C.: Source Reclassification.
CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF
AIR POLLUTION, effective 11-23-94
62-213.205, F.A.C.: Annual Operation Licensing Fee.
62-213.210, F.A.C.: Permit Application Processing Fee.
62-213.220, F.A.C.: Florida Air-Operation License Fee Account.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.415, F.A.C.: Trading of Emissions Within a Source.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.450, F.A.C.: Permit Review by EPA and Affected States.
62-213.460, F.A.C.: Permit Shield.
62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1) Major Air Pollution Annual Operation License Fee Form and Instructions.
<g>
CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS,
effective 11-23-94
62-296.310(3), F.A.C.: Unconfined Emissions of Particulate Matter.
```

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

```
>
CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS
MONITORING, effective 11-23-94
<
62-297.310, F.A.C.: General Test Requirements.
62-297.330, F.A.C.: Applicable Test Procedures.
62-297.340, F.A.C.: Frequency of Compliance Tests.
62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions
               Unit.
62-297.350, F.A.C.: Determination of Process Variables.
62-297.570, F.A.C.: Test Report.
62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.
>
Miscellaneous:
62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94
62-257, F.A.C.: Asbestos Notification and Fee, effective 11-23-94
62-273, F.A.C.: Air Pollution Episodes, effective 09-25-92
62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling,
         effective 04-15-92
<hr>
<IMG SRC = "http://www.dep.state.fl.us/images/back.gif">
<A HREF = "arm.html" > Return to Air Resource Management</A>
<br>
<A href="/index.html">
<img src="http://www.dep.state.fl.us/parks/images/home.gif">Return to DEP Home Page</a>
<HR>
Philip Shoemaker,
<EM><a rev=made href="mailto:shoemaker_p@dep.state.fl.us">shoemaker_p@dep.state.fl.us</a></EM>
```

### APPENDIX I

Plant Operating Scenarios and Waste Types Processed

#### Appendix I

#### PLANT OPERATING SCENARIOS AND WASTE TYPES PROCESSED

A summary of the operating scenarios for the Lake County Resource Recovery Facility is presented below. Different modes of operation such as startup/shutdown, firing different fuel types, research and development activities, and malfunctions are identified. Also described are the waste types permitted to be processed by the facility, such as wood chips, municipal-type solid waste, bio-hazardous waste, and oil waste.

With the exception of equipment startup, shutdown, and malfunctions, the listed operating scenarios will not affect the plant's ability to meet existing allowable emission limits. OMSL will demonstrate compliance with current applicable air pollution control requirements under each operating scenario using the methods described in the application.

No alternative operating scenarios have been identified for the facility because the operations described below represent the plant's currently permitted modes of operation, rather than alternative operating scenarios.

#### **PLANT OPERATING SCENARIOS**

#### **Massburn Combustion Units**

#### Fuel Usage

As previously identified in the operating permit application forms, combustion units 1 and 2 process a combination of solid waste, and biological wastes at a maximum capacity of 288 tons per day per unit at 5000 Btu/lb solid waste heat content. Natural gas is fired to control furnace temperature, and enhance combustion, during periods of startup, shutdown and malfunction.

#### **Hours of Operation**

Each unit is capable of operating 24 hours per day, 7 days per week, and 52 weeks per year for an annual total of 8,760 hours per year.

#### Startup/Shutdown

The information provided in this Operating Permit Application Form contains only one set of emission limits that are proposed for each unit. These emission limits will apply to these units under their normal operations of combusting refuse. Warmup, startup, and shutdown, and malfunction periods are not considered as "normal operations" for these units. The U.S. EPA has determined that the rules promulgated under 40 CFR 60.30b (Subpart Cb - Emission Guidelines for Municipal Waste Combustors (MWC), and under 40 CFR60.50b (Subpart Eb - New Source Performance Standards for MWCs) should only apply under steady-state conditions where the facility employs "good combustion practices". The EPA's review of operations data from MWC units has resulted in exclusionary provisions as outlined under 40 CFR 60.58b(a) during startup, shutdown, and malfunction conditions. This provision eliminates the applicability of emission standards during periods of warmup, startup, shutdown, and malfunction.

The federal regulation states that periods of warmup, startup, shutdown, and malfunction may not exceed three hours per occurrence. The startup period is considered to commence when the affected facility begins continuous burning of MSW and does not include any warmup period when the affected facility is combusting only non-MSW fuel. For purposes of this regulation, continuous burning begins when continuous, semi-continuous, or batch feeding of refuse starts to occur for the purposes of waste disposal, energy production, or providing heat to the combustion system in preparation of waste disposal or energy production. As provided in 40 CFR 60.58b(a)(1)(ii), "...The use of municipal solid waste solely to provide thermal protection of the grate or hearth during the startup period when municipal solid waste is not being fed to the grate is not considered to be continuous burning."

#### **Definitions**

Operations during warmup, startup, shutdown, and malfunction is considered unstable, transitory in nature, and outside the normal control range of the units. In an attempt to distinguish these operations, the descriptions provided below indicate the characteristics of these non-normal operating conditions.

#### Warmup Operations

The mass burn units are considered to be in warmup mode when only natural gas is being fired in the furnace. No refuse is combusted during the warmup period. As outlined under typical operational procedures described below, air pollution control equipment are placed in full service prior to introducing MSW to the combustors. Once the combustor temperature reaches the point at which the system may be fully placed in service, refuse feed commences and the warmup period is ended.

#### Startup Operations

Generally, refuse is added gradually to the fuel stream and the natural gas firing is decreased at a rate which ensures the mass burn combustor temperatures remain in the normal operating range. Once the mass burn unit commences burning refuse continuously (i.e., feed chute open) the startup period begins.

#### Shutdown Operations

The shutdown sequence (excluding malfunction events) employed at the OMSL facility involves halting the refuse feed and firing auxiliary fuel until the grates are clear of MSW. Auxiliary fuel is used to prevent the temperatures within the mass burn units from dropping below critical levels required to maintain "good combustion practices".

#### Typical Operational Procedures for Startup and Shutdown

The following outlines the steps taken to startup the combustors from a cold start and then to shut the units down.

#### Startup

Step 1: Natural gas is fired to warmup the boiler.

Step 2: Spray dryer absorber and carbon injection system is put in service when the

appropriate economizer temperature is achieved.

Step 3: MSW is continuously introduced in the combustor when required operating

temperature is achieved.

#### Shutdown

Step 1: Stop flow of MSW to unit.

Step 2: MSW is burned off the grates.

Step 3: Induced draft fan, overfire air fan, and underfire air fan are brought offline.

Step 4: Combustor is secured.

Step 5: Carbon injection system and spray dryer absorber are taken offline.

Note: Air pollution control equipment is on-line throughout the startup and shutdown periods.

If startup is initiated from a "cold" start, then the maximum time period for startup would be approximately 8 hours. A range of 6 to 8 hours covers minimum and maximum startup periods. Once the flue gas temperature of the mass burn combustor reaches 1800°F for a retention time of one second within the combustion zone, then MSW is introduced into the combustor. Also, natural gas is used to attain a minimum flue gas temperature of 1500°F for one second within the combustion zone during startup and shutdown.

Shutdown, which takes approximately six hours, occurs in two steps. The first step is referred to as "bake out". This is the time period for the combustor to completely burn the existing MSW on the grates and lasts approximately 2 to 3 hours. During this time period, the gas firing rate is increased as the flow of MSW is shut off. The second step of shutdown is the "cool down" period to allow the combustor to achieve a safe temperature for workers to enter the unit and perform maintenance and repair activities. The time required for cool down is approximately 3 to 4 hours.

#### Startup/Shutdown Effects

The most significant effect that occurs during the startup period is increased emissions of CO and volatile organic compound. This occurs because of co-fuel combustion and tramp air in the mass burn unit which exaggerates concentrations when they are corrected to 12% CO<sub>2</sub> (or 7% O<sub>2</sub>). Short periods of elevated CO and VOC emissions will not cause exceedances of applicable State and national ambient air quality standards. Additionally, OMSL employs auxiliary fuel use practices to ensure that "good combustion practices" and other emission requirements are satisfied during startup periods.

With respect to shutdown periods, auxiliary fuel is used to prevent mass burn unit temperatures from dropping below critical levels and to ensure complete burnout of flue gas constituents. Elevated CO and VOC emissions may occur during this operational period. The time required to clear the furnace grates of waste is estimated to occur over a two to three hour period. The change in these pollutant emissions, which occur infrequently, will be short in duration and are expected to remain in compliance with applicable State and national ambient air quality standards.

### **Air Pollution Control Equipment**

The air pollution control equipment that treats the exhaust air from the combustor is identified in the operating permit application forms as the carbon injection systems, SDA and the baghouse systems. In accordance with good engineering practice and suitable operating temperatures, these systems

remain operational during the startup and shutdown periods. Also, SO<sub>2</sub>, CO and opacity emissions are continuously monitored during this time period.

#### **Malfunctions**

In general, malfunction events are sudden and unavoidable. Malfunctions involve the failure of a piece of equipment or system, not withstanding appropriate preventive maintenance that has been documented to perform as designed, and include a broad range of operational scenarios. Through independent research and database review, DEP has determined that these events potentially result in transitory periods of non-normal operation, and has acknowledged the inapplicability of these events to emission or performance standards through the exclusionary provision of 62-210.700, Florida Administrative Code (F.A.C.).

Three types of equipment failures that may occur at the Lake facility based on historical performance include: boiler tube ruptures; SDA lime system line obstruction; carbon pneumatic conveying systems malfunctions, carbon feeder systems malfunction and bottom ash chute obstruction. These conditions are often unavoidable during operation of this type of facility.

In the event that one of these upset conditions occurs, excursions of allowable emission limitations may result for a short period of time. Although the process monitoring equipment within the main control room allows operators to oversee plant operations on a 24-hour basis, the initial moments of an upset condition may cause an excursion during such time that the equipment failure is noted and then taken off-line. The excursions that could result during the discovery phase and until corrective measures are implemented may include elevated SO<sub>2</sub> levels, increased opacity, excess fugitive dust, or elevated CO levels or elevated Hg emissions.

Another unavoidable condition that can arise which can result in excess air emissions is getting bumped by the electric power pool. When this occurs, the plant must shut down electric generation, which results in temporary loss of power. During this period, automatic cut-offs are activated to

protect equipment from power surges. Under this condition, it takes several minutes to get outside power to the plant and to reset equipment. During the outage, fuel cut-off systems are triggered, ID and FD fans are shut off, and power is off to the air pollution control system. Because there is still fire in the boiler, air emissions are generated. Until power is restored, any emissions from the combustor are vented through the stack unabated. This situation occurs infrequently. OMSL has procedures in place to react as quickly as possible to safeguard equipment as well as to minimize excess emissions when this situation occurs.

Another unavoidable event that can result in excess emissions is when bag failure occurs in the baghouse of the lime silo. When this occurs, excess particulate matter emissions are released into the air. The company has a preventive maintenance program in place to inspect the bags regularly in order to minimize the chance of failure.

Although it is impossible to prevent equipment malfunctions, it is possible to limit the duration of such excursions. To this end, OMSL has instituted an employee training program that educates and sets forth procedures for responding to different emergency equipment failures.

As called for in the plant's existing air permit, OMSL will notify the DEP by telephone when necessary and subsequently in writing within seven days, of any upset or malfunction that would affect air emissions.

TYPE OF WASTE PROCESSED
Solid Waste

The municipal waste combustors at OMSL are capable of processing non-hazardous "solid waste", as defined at 62-701.200(73), F.A.C. as:

"...garbage, refuse, special waste, or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from domestic, industrial, commercial, mining, agricultural, or governmental operations..."

Per conditions in the existing construction permit, "special waste" is not processed at OMSL.

A significant portion of the solid waste processed at the facility is "municipal solid waste" or "municipal-type solid waste", and is defined below.

### Municipal-Type Solid Waste

Different regulatory definitions of "municipal solid waste" exist. Definitions can be found at 40 CFR 60.51a (NSPS Subpart Ea), 40 CFR 60.51b (NSPS Subpart Eb), and Chapter 403.706(5) of the Florida Statutes. The Florida Administrative Code currently does not define "municipal solid waste."

As of the submittal of this application, the appropriate definition of "municipal solid waste" should be drawn from Chapter 403.706(5), F.S., as the Lake County Resource Recovery Facility is not subject to NSPS Subparts Ea nor Eb. Chapter 403.706(5), F.S. defines municipal solid waste as:

"any solid waste, except for sludge, resulting from the operation of residential, commercial, governmental, or institutional establishments that would normally be collected, processed, and disposed of through a public or private solid waste management service. The term includes yard trash but does not include solid waste from industrial, mining, or agricultural operations."

#### Bio-hazardous Waste

OMSL accepts biohazardous waste as defined as per rule 17-712.200(2), FAC. OMSL is permitted to "perform the work or operate" the facility under FAC Rule 7-2 and 7-4. (Permit #35-115379 as

amended.) The facility complies with the Biological Waste Incineration Facilities Rules, "Emission Limiting and Performance Standards" in chapter 17-2.600 (1)(d) of FAC. The biohazardous/biomedical waste is introduced in the Martin stoker boiler (via the feed hopper) and is co-fired along with solid waste.

#### Oily Waste

The facility is currently permitted to process solid waste containing petroleum-based materials as components of the normal waste fuel types. These categories include solid waste commingled with virgin petroleum products, and solid waste commingled with used oil.

#### Solid Waste Commingled with "Virgin" Petroleum Products

In general, this waste type of fuel can be defined as solid waste that would result from the clean-up of virgin petroleum-based fuel spills. Fuel oils, hydraulic oils and lubricating oils are some of the categories of liquids expected to be found in the clean-up waste. Other components of this waste type would include absorbent media (diatomaceous earth, polypropylene, cellulose fibers, etc.), cleaning materials, such as pillows, booms, pads, socks and debris (i.e. rags, gloves, coveralls, etc.).

The waste delivered to OMSL is a solid with no free liquids. All liquids would be solidified, if necessary, with absorbent materials prior to delivery to OMSL. The waste is acceptable if the waste can be classified as nonhazardous per Federal regulations, 40 CFR Part 261 and applicable Florida State regulations (Hazardous Waste Regulation 17-730). In support of the nonhazardous material classification, OMSL requires that each generator provide a statement certifying that the waste is nonhazardous.

#### Solid Waste Commingled with Used Oil

Solid Waste commingled with used oil is generated from the clean-up of used oil spills, tank cleanings, maintenance or cleaning activities associated with used oil management. Components of

this waste fuel type include used oil and nonhazardous solid waste materials and debris, such as absorbent media, rags, personnel protective equipment, paper filters, incidental soils, etc. The used oil would not be present as bulk liquid, and would only be accepted at OMSL for processing if it did not contain free liquid oil, or it was solidified by the generator prior to delivery.

This waste type fuel will be managed per Florida Used Oil Regulations (Chapter 17-710). Applicable classification, recordkeeping and tracking requirements will be followed for processing this waste type. Recordkeeping and acceptance criteria standards will be maintained at the OMSL facility for FDEP inspection to demonstrate compliance with any regulatory or permit specific requirements.

OMSL does not accept any hazardous waste or any materials prohibited by permit. OMSL does not accept any of the following wastes containing "Used Oil": a) Liquid Used Oils (except internally generated used oil -refer to the next section); b) Mixtures of Used Oils and Listed Hazardous Wastes, and 3) Mixtures of Used Oils and materials that exhibit hazardous characteristics other than ignitability. (Although some of the used oils may have a low flash point that would classify the liquid oil as RCRA ignitable, the liquids will be solidified prior to delivery, thus eliminating the ignitable characteristic).

#### **Internally Generated Used Oil**

OMSL internally generates approximately twenty-five (25) gallons of "Used Oil" per month as a result of internal operations. The extremely small amount of used oil that is generated internally is thoroughly mixed in the refuse pit with other municipal solid waste in accordance with normal operational procedures. OMSL will maintain the records required pursuant to 40 CFR Part 279 and Florida State Regulation 17-710. OMSL will not accept liquid used oil from any outside generators.

#### FLORIDA GAS TRANSMISSION COMPANY

Spot Analysis of Natural Gas for Delivery in Florida (Brooker Chromatograph)

DATE:

April 30, 1996

TIME:

12:56

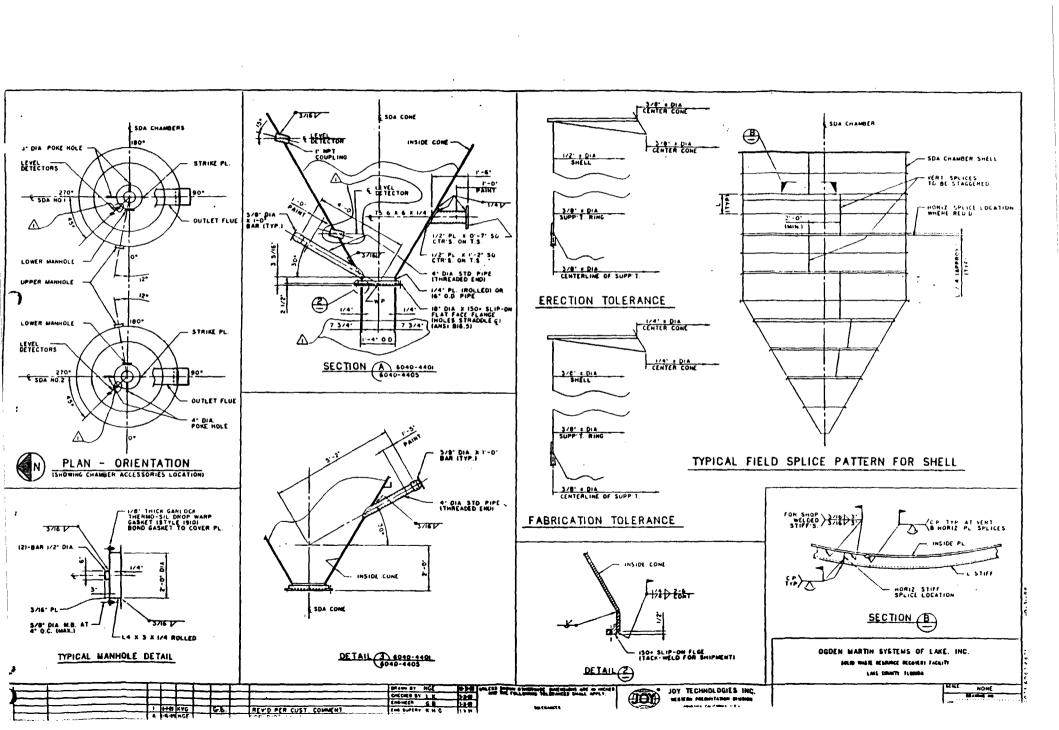
Component Name	Mole &
Hexane	0.073
Propane	0.549
Isobutane	0.140
n·Butane	0.116
Isopentane	0.045
n-Pentane	0.027
Nitrogen	0.364
Methane	95.100
co <sub>2</sub>	0.921
Ethane	2.666
Totals	100.000

Dry Btu/cf @ 14.730 psia and 60°F = 1041.1 Real Relative Density = 0.5906 = 0.5906

> Total Sulfur 1123 H20 6.3 PPM 1.3 PPM 2.1 lb/MMcf

### APPENDIX J

**Control** Equipment Descriptions





#### 3.0 EQUIPMENT SPECIFICATIONS

#### 3.1 DESIGN BASIS

The following criteria provided the basis for the design of the fabric filter particulate removal system described in this manual. Standard conditions are defined as 70°F and 14.7 psia.

#### 3.1.1 Operating Conditions (Inlet)

Process Gas Volume, acfm	62,717
Inlet Gas Temperature, °F	285
Inlet Dust Concentration, gr/ACF	3.5
Operating Pressure, inches wg	-10

#### 3.1.2 Design Criteria

Maximum Design Temperature, °F	500
Maximum Design Pressure, inches wg	±20
Snow Load, PSF	0
Wind Load, PSF	15-19
Live Load, PSF	50
Dust Load (hopper), PCF	100
Seismic Zone	1

### 3.1.3 Filter Data

Filter Data		(5) = 20
Effective Filter Area (sf):		21 12 176
Each bag Each compartment	58.tx	31.42 5,529
Each fabric filter	(ک	22,117 <del>2</del> 3,500 16,588
One (1) compartment out per fabric filter*		10,300 ×

Filter	(air-to-cloth) Ratio:	
A11	compartments active	
0ne	(1) compartment out per fabric filter*	

2.84:1	22,1175
3.78:1 -	- 6771 TACE
	10,588 SF

### 3.1.4 Instrumentation Setpoints

Inlet Gas Temperature, °F: HI alarm LO alarm	500 240
Differential Pressure, "wg: HI HI P Alarm HI △P Alarm	10
Hopper Heater setpoint, °F	285 50-60**

<sup>\*</sup>One (1) compartment off line, cleaning
\*\*Operation below 40 psig will void any performance guarantee



#### 3.2 EQUIPMENT CONFIGURATION

Details regarding the specific configuration of the purchased equipment are summarized in this section.

### 3.2.1 Configuration

PULSEFLO® Fabric Filter Model	4 Module PF6020-176
Number of Fabric Filters	Two
Number of Modules per Fabric Filter	4
Module Arrangement	2 x 2
Module size (width depth)	7'-8" x 11"-0"
Inlet Configuration	Spool Inlet
Outlet Configuration	Offset Outlet

### 3.2.2 Filter Bags

Bag Arrangement	11 x 16
Number of Bags per Module	176
Total Number of Bags per Fabric Filter	704
Bag Size (1.57' net circumference):	
Nominal Diameter (inches)	. 6
Overall Length (feet)	20

Bag Type	Teflon Coated Fiberglass*
Fabric Weight	16 Oz/Square Yard
Bag Cage	Electrozinc plated carbon steel*
Bag Tube Sheet Connection	Snap Ring

### 3.2.3 Dampers

Inlet	Manual	Butterfly
Outlet	Pneumatic	Butterfly

#### 3.2.4 Hoppers

Hopper Type	Pyramidal
Hopper Valley Angle	55°
Hopper Capacity	

#### 3.2.5 Materials of Construction

Casing Plate	3/16" ASTM A36
Hopper Plate	1/4" ASTM A36
Shapes	ASTM A36
Pipe	A53 Grade B or A501
Bolts	ASTM A325

<sup>\*</sup> One baghouse is installed Ryton on Ryton Scrim Felt Bags over an Empigard Epoxy coated cage.



### 3.3 OPTIONAL AUXILIARY EQUIPMENT

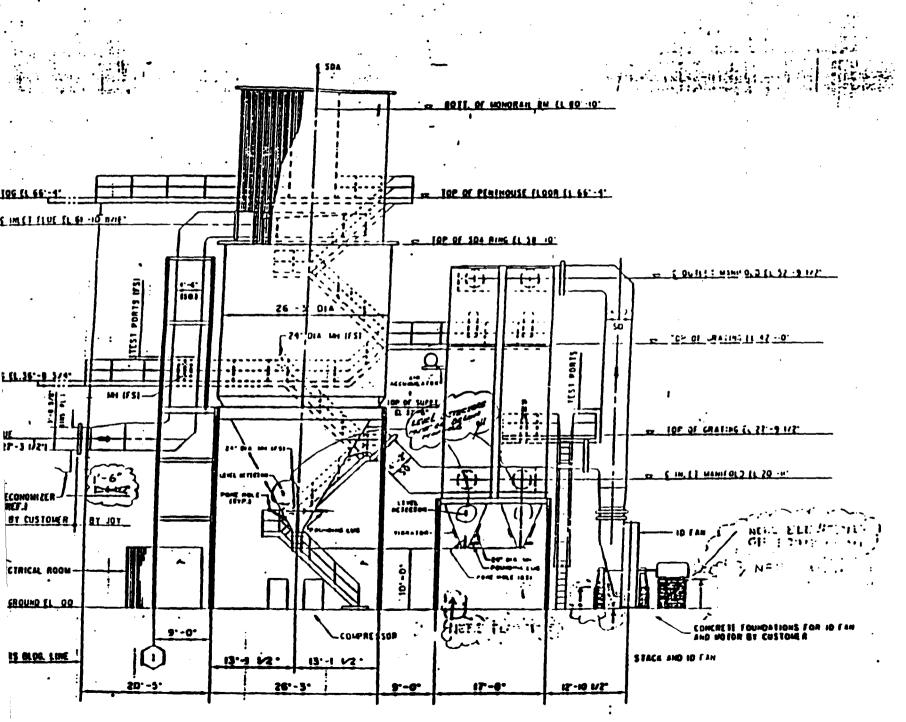
The PULSEFLO® fabric filter may be supplemented with accessories as necessary to meet individual requirements. Auxiliary equipment provided is identified on the "Table of Supplied Auxiliary Equipment"

### 3.3.1 Table Of Supplied Auxiliary Equipment

Tuble of Supplied Additional Equipment		SUPPLIED	
EQUIPMENT	TYPE	YES	NO -
Hopper Accessories Heaters Vibrators Level Detectors Air Locks Conveyors	Blanket/Strip Electric Capacitance	X X X	X X
Bypass Duct Dampers Expansion Joints	Poppet Fabric	X X	
Inlet Manifold Dampers	Butterfly/Chain Operated	X	
Outlet Manifold Dampers Expansion Joints	Butterfly/Pneumatic Fabric	X X	
Compressed Air Compressor Accumulator Valves Gauges	Screw Steel Tank	X X X X	
Electrical Equipment Control Room Motor Control Center Power Distribution Panel Switchgear	- - -	X X X	x
Interlocks	Key		X
Instrumentation Bag Failure Fire Protection	<u>.</u>		X X
Temperature	Thermocouple	X	
Pressure & Pressure Drop Outlet Damper	Photohelic	X	
Position Indicator Bypass Damper	Limit Switches/Lights	X	-
Position Indicator	Limit Switches/Lights		X

### APPENDIX K

**Stack Sampling Facilities** 



### APPENDIX L

Monitoring, Recordkeeping, and Reporting Requirements

### Appendix L - Monitoring, Recordkeeping, and Reporting Requirements Ogden Martin Systems of Lake, Inc.

Requirement Type <sup>1</sup>	Requirement
Monitoring - Emission Unit Nos.	The following continuous monitoring is performed on both Emission Unit Nos. 1 and 2 in accordance with the provisions of Permit No. AO35-193817:
1 and 2	Steam Production
.^.	Furnace Exit Gas Temperature
	Flue Gas Temperature at Exit of Acid Gas Control System
	Activated Carbon Injection Rate
	Stack Flue Opacity (6 minute ave.)
	O <sub>2</sub> at Economizer Outlet
	O <sub>2</sub> at Stack
	CO <sub>2</sub> at Economizer Outlet
	CO <sub>2</sub> and O <sub>2</sub> at Stack
	SO <sub>2</sub> at Economizer Outlet
	SO <sub>2</sub> at Stack
Monitoring - Emission Unit Nos. 3 and 4	Emissions monitoring not required. Good operating practices used to insure baghouse units operate properly.
Record Keeping - Emission Unit Nos. 1 and 2	As required by Permit No. AO35-193817:
	A complete file of all measurements, including continuous emission monitoring system, monitoring device, and performance testing measurements; all continuous emission monitoring system or monitoring device calibration checks; adjustments or maintenance performed on these systems or devices; and all other information required, recorded in a permanent legible form suitable for inspection. The file should be retained for at least two years following the date of such measurements, maintenance, reports and records.
Record Keeping - Emission Unit Nos. 3 and 4	Record keeping not required. Good operating practices used to insure baghouse units operate properly.

## Appendix L Monitoring, Recordkeeping, and Reporting Requirements Ogden Martin Systems of Lake, Inc.

Requirement Type <sup>1</sup>	Requirement
Performance Tests- Emission Unit Nos. 1 and 2	The following performance tests are conducted in accordance with the requirments of Permit No. AO35-193817:
	Compliance tests shall be conducted at the maximum capacity and at the maximum firing rate.
	PM (EPA Method 5 or 17) every 12 months
	NO <sub>x</sub> (Method 7, 7A, 7B, 7C, 7D, or 7E) every 12 months
	CO (EPA Method 10) every 12 months
	HCl (EPA Method 26) every 12 months
	Opacity (40 CFR 60.11(b) and (e)) every 12 months
·	At least 90 days prior to permit expiration, the following performance tests must be performed:  PM (EPA Method 5 or 17)  NO <sub>x</sub> (Method 7, 7A, 7B, 7C, 7D, or 7E)  CO (EPA Method 10)  VOC (EPA Method 25 or 25A)  Lead (EPA Method 12)  Fluoride (EPA Method 13B)  Beryllium (EPA Method 101A)  Opacity (40 CFR 60.11(b) and (e))  HCl (EPA Method 26)  SO <sub>2</sub> (EPA Method 6, 6C, or 8)  Compliance with the requirement for 70% control of SO <sub>2</sub> emissions is determined using the test methods indicated above or a CEMS for SO <sub>2</sub> before and after the air pollution control equipment.
	Each unit which incinerates biohazardous waste shall conduct annual compliance tests which demonstrate compliance with biohazardous incinerator standards. The test must be conducted while combusting the maximum desired rate of biohazardous waste and this rate must be determined during the test.
Performance Tests- Emission Unit Nos. 3 and 4	Visible Emissions test performed every 12 months in accordance with 62-297.340(d), F.A.C.

### Appendix L Monitoring, Recordkeeping, and Reporting Requirements Ogden Martin Systems of Lake, Inc.

Requirement Type <sup>1</sup>	Requirement
Reporting - Emission Unit Nos. 1, 2, 3 and 4	35 days prior notification in writing of compliance tests provided to the FDER District Office. (Permit No. AO35-193817)  Results of compliance tests submitted to Central District Office with 45 days after completion of the test. (Permit No. AO35-193817)  Excess Emission Reports (postmarked 30 days after each calendar quarter) for any calendar quarter during which there are excess emissions. If there are no excess emissions, a semiannual report will be submitted stating that no excess emissions occurred during the reporting period. (Permit No. AO35-193817)  An Annual Operations Report (DER Form 17-1.202(6)) by March 31 of each year. (Permit No. AO35-193817)  Carbon and Lime Silo Visible Emissions Test annually. (62-297.340(d), F.A.C.)  Calibration Gas Audit for 3 of every 4 quarters per year. RATA performed in connection with stack test for final quarter. (40 CFR 60, App. F)
	Air Operation License Fee Due by March 1 each year. (62-213.200, F.A.C.)

<sup>&</sup>lt;sup>1</sup> Emission Unit No. 5 (Cooling Tower) is an unregulated emission unit and thus has no monitoring, record keeping, performance testing, or reporting requirements.

### APPENDIX M

**Existing Facility Permits** 



### Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-376:

Lawton Chiles, Governor

Carol M. Browner, Secretar

Permittee: Ogden Martin Systems of Lake, Inc. 40 Lane Road fairfield, NJ 07007-2615

Attention: Gary K. Crane, Ph.D., Exec. V.P.

1. D. Number: Permit/Certification . Number: A035-193817 Date of Issue:

Expiration Date: October 25, 1996

County: Lake Latitude/Longitude: 28°44'22"N/81°53'23"W

UTM: 17-413.12 KmE; 3179.21 KmN Project: Waste to Energy Facility Units No. 1 and 2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application  $\alpha$ nd approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate two 288 ton-per-day Cambustors which are fueled by wood chips and municipal solid waste.

The facility is rated for a maximum of 15.7 megawatts of energy production.

These sources are located at 3830 Rogers Industrial Park Road in Okahumpka, Lake County, Florida.

General Conditions are attached to be distributed to the permittee only.

#### GENERAL CONDITIONS:

. . . . .

- 1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are permit conditions and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, f.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- 2. This permit is valld only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any inputhorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in subsactions 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or dry invation of personal rights, nor any infringement of sederal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
- 1. This parmit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasthold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or properly caused by the construction or operation of this perimitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related applytenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision inclines the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of oredentials or other documents as may be required by law and at reasonable times, access to the premittee where the permittee activity is located or conducted to:
  - (a) Have access to and copy any records that must be kept under conditions of the permit;
  - (b) inspect the facility, equipment, practices, or operations regulated or required under this period; and
  - (c) Sample or implifor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - (a) A description of and cause of noncompliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticopated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The pernditee shall be responsible for any and all damages which may result and may be subject . to enforcement action by the Department for penalties of for revocation of this permit.

#### GENERAL CONDITIONS:

- In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, f.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules. 9.
- The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. 10.
- This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.100, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. 11.
- This pernut or a copy thereof shall be kept at the work site of the permitted activity. 12.
- 13. This permit also constitutes:
  - Determination of Best Available Control Technology (BACT)
  - Determination of Prevention of Significant Deterioration (PSD)
  - Certification of compliance with state Water Quality Standards (Section 401, PL 92-500)
  - () Compliance with New Source Performance Standards
- 14. The permittee shall comply with the following:
  - Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the resention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all manitaring information lincluding all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:

    - 1. the date, exact place, and time of sampling or measurements;
      2. the person responsible for performing the sampling or measurements;
      3. the dates analyses were performed;
      4. the person responsible for performing the analyses;
      5. the analytical techniques or methods used;
      6. the results of such analyses.
- When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compilance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected 15. promptiy.

PERMITTEE:

Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D.,

Exec. V.P.

I. D. Number:

Permit/Certification Number:

A035-193817

Date of Issue:

Expiration Date: October 25, 1996

SPECIFIC CONDITIONS:

#### OPERATING CONDITIONS

1. Municipal Waste Combustor

End Some

- a. The maximum individual MWC throughput shall not exceed 288 tons per cay, 120 million Btu per hour and 69,000 pounds steam per hour, 13-hour average). The maximum throughput of biohogardous waste, for Unitleanly, Shall not exceed the total of 2.15 fm/hr and 51.60 tons/day Sl25
- b. The design surnace mean temperature at the sully mixed zone of the combustor shall be no less than 1800° for a combustion gas residence time of at least one second. The function of temperature, as determined draw control room readings, shall be no less than 1138° F. 5125192 muslmant
- c. The MWC shall be (ueled with wood chips or municipal solid waste, which Radioactive waste may not be burned unless the combusto: has been issued a permit for such burning or the waste is such quantity to be exempt in accordance with Department of Health and Rehabilitative services (HRS) Rule 100-91 or 100-104.003, F.A.C. Hazardous waste may not be burned unless the combustor has been issued a permit for such burning or the waste is of such quantity to be exempt in accordance with Department Rule 17-30, F.A.C. Other wastes and special wastes shall not be burned without specific prior written approval of the Florida DER.
- d. Auxiliary fuel burners shall be fueled only with distillate fuel oil or gas (e.g., natural or propane). The annual capacity factor for fuel oil or gas shall be less than 10%, as determined by 40 CFR 60.43b(d). If the annual capacity factor for fuel oil or gas is greater than 10%, the facility shall be subject to 40 CFR 60.44b, standards for nitrogen oxides.
- e. Auxiliary fuel burner(s) shall be used at start up during the introduction of MSW fuel until design furnace gas temperature is achieved. All air pollution control and continuous emission monitoring equipment shall be operational and functionin: properly prior to the incineration or ignition of waste and until all the wastes are incinerated. During shut down, the combustion chamber temperature requirement shall be maintained using auxiliary burners until wastes are complete combusted.

PERMITTEE:

Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D., Exec. V.P.

I. U. Number:

Permit/Certification Number:

A035-193817

Date of Issue:

Expiration Date: October 25, 1996

f. The facility may operate continuously (8760 hrs/yr).

g. The combustor shall be fed so as to prevent opening the combustor to the room environment.

#### 2. Air Pollution Control Equipment Design

- a. Each MWC shall be equipped with a particulate emission control device.
- b. Each MWC shall be equipped with an acid gas control device designed to remove at least 90% of acid gases and 70% sulfur dioxide emissions.
- c. The acid gas emission control system shall be designed to be capable of cooling flue gases to an average temperature not exceeding 300°F (3-hour rolling average).

#### 3. Continuous Emission Monitoring

Continuous emission monitors for opacity, oxygen, carbon monoxide, carbon dioxide, and sulfur dioxide shall be installed, calibrated, maintained and operated for each unit.

- a. Each continuous emission monitoring system (CEMS) shall meet performance specifications of 40 CFR 60. Appendix B. The SO<sub>2</sub> CEMS sample point shall be located downstream of control devices for each unit.
- b. CEMS data shall be recorded during periods of startup, shutdown and malfunction but shall be excluded from emission averaging calculations for CO, SO<sub>2</sub>, and opacity.
- c. A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.
- d. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation and operation of all CEMS.

PERMITTEE: Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D., Exec. V.P.

I. D. Number: Permit/Certification Number:

A035-193817 Date of Issue:

Expiration Date: October 25, 1996

Opacity monitoring system data shall be reduced to 6-minute e. averages, based on 36 or more data points, and gaseous CEMS data shall be reduced to 1-hour averages, based on 4 or more data points, in accordance with 40 CFR 60.13(h).

- f. Average CO and SO<sub>2</sub> emission concentrations corrected for CO<sub>2</sub>, shall be computed in accordance with the appropriate averaging time periods included in Condition No. 3.
- For purposes of reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Condition No. 3 herein, which exceeds the applicable emission limit in Condition No. 7.

#### 4. Operations Monitoring

- Devices are to be used to continuously monitor and record steam production, furnace exit gas temperature (FEGT) and flue gas temperature at the exit of the acid gas control equipment. An FEGT to combustion zone correlation shall be established to relate furnace temperature at the temperature monitor location to furnace temperature in the overfire air fully mixed zone. This correlation shall be continuously available for inspection at the site.
- The furnace heat load shall be maintained between 80% and 100% of the design rated capacity during normal operations. The lower limit may be extended provided compliance with the carbon monoxide emissions limit and the FEGT within this permit at the extended turndown rate are achieved.
- 5. Any change in the method of operation, fuels, equipment or operating hours colonies chow shall be submitted for prior approval to DER's Central District office.
- In order for the burning of biohazardous waste to be incorporated into the Dury including but not limited to: the Enjoying that allers
  - Particulate matter emissions shall not exceed 0.020 grains per dry standard cubic foot of flue gas, corrected to 7%  $0_2$ . (See Table 700-1)
  - Hydrochloric acid (HCL) emissions shall not exceed 50 parts per million by volume, dry basis, corrected to 7% 02 on a three hour average basis or shall be reduced by 90% by weight on an hourly average basis. (See Table 700-1)

PERMITTEE:

Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D.,

Exec. V.P.

I. D. Number:

Permit/Certification Number:

A035-193817

Date of Issue:

Expiration Date: October 25, 1996

- c. This facility is subject to the following design, operating, monitoring and operator training requirements.
  - 1. The source shall be designed to provide for a residence time of at least of at least one second in the combustion zone, at no less than 1800°F for the combustion gases.
  - 2. Mechanically fed facilities shall incorporate an air lock system to prevent opening the source to the room environment. The volume of the loading system shall be designed to prevent overcharging thereby assuring complete combustion of the waste. The feed chute design provides an air lock.
  - Carbon monoxide (CO) emissions shall not exceed 100 parts per million by volume, dry basis, corrected to 7% 02 on an hourly basis. (See Table 700-1)
  - 4. Incineration or ignition of waste shall not begin until the combustion chamber temperature requirement is attained. All control equipment shall be operational and functioning properly prior to the incineration or ignition of waste and until all the wastes are incinerated. During shutdown, the combustion chamber temperature requirement shall be maintained using auxiliary burners until the wastes are completely combusted.
  - 5. Radioartive waste may not be burned unless the source has been issued a permit or the waste is of such quantity to be exempt in accordance with Rule 100-91 or 100104.003, F.A.C.
  - h. Hazardous waste may not be burned unless the source has been issued a permit or the waste is of such quantity to be exempl in accordance with Rule 17-30, F.A.C.
  - 7. All biological waste combustor operators shall be trained by the equipment manufacturer's representatives or another qualified organization as to proper operating practices and procedures. The content of the training program shall be submitted to the Department for approval. The applicant shall submit a copy of a certificate verifying the satisfactory completion of a department approved training program prior to issuance or renewal of the operating permit. The applicant shall not operate the source unless it is operated by an operator who has satisfactorily completed the required training program.

Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D.,

Exec. V.P.

I. D. Number:

Permit/Certification Number:

A035-193817

Date of Issue:

Expiration Date: October 25, 1996

- d. [ach owner or operator of biological waste incineration facility shall install, operate, and maintain in accordance with the manufacturer's instructions continuous emission monitoring equipment.
  - (1) The monitors shall record combustion chamber exit temperature and oxygen.
  - (2) Any owner or operator subject to the provisions of Rule 17-2.710(5), F.A.C. shall maintain a complete file of all measurements, including continuous emissions monitoring system, monitoring device, and performance testing measurements; all continuous emissions monitoring system or monitoring device, calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required, recorded in a permanent legible form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports and records.

Biohazardous waste may be incinerated by the applicant for the purp se of stack testing to demonstrate reasonable assurance and compliance with the regulations, and for a period not to exceed 90 days for report submittal and Department review. The compliance test must provide the Department with reasonable assurance that the biohazardous standards are met and must be conducted no later than 5 days after the incineration of biohazardous waste begins. The test must be conducted while combusting the maximum desired rate of biohazardous waste and this rate must be determined during the test.

# EMISSION LIMITS

7. Flue gas emissions from each unit shall not exceed the following:

a. Particulate:

0.0150 grains/dscf corrected to 12%  $CO_2$ , or 0.020 grains/dscf corrected to 7%  $O_2$ , whichever is less

b. Sulfur Dioxide:

60 ppmdv corrected to 12% CO<sub>2</sub>, 6-hour rolling average:

DER FORM 17-1.201(5) Effective November 30, 1982 Page 8 of 13



Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D., Exec., V.P.

I. D. Number:

Permit/Certification Number:

A035-193817 Date of Issue:

Expiration Date: October 25, 1996

70% reduction of uncontrolled SO<sub>2</sub> emissions, 6-hour rolling average. Not to exceed 120 ppmdv corrected to

12% CO2, 6-hr rolling average.

∼ c. Nitrogen Oxides:

d. Carbon Monoxide:

e. Volatile Organic Compounds:

f. Lead:

q. Fluoride:

h. Beryllium:

i. Mercury:

k. Hydrochloric Acid:

j. Visible emissions:

385 ppmdv corrected to 12% CO<sub>2</sub>.

100 ppmdv corrected to 7% 02 on an hourly-average basis.

70 ppmdv as carbon corrected to 12% CO<sub>2</sub>.

.

or.

3.1  $\times$  10<sup>-4</sup> gr/dscf corrected to 12%.

CU2.

 $1.5 \times 10^{-3}$  gr/dscf corrected to 12%

CO<sub>2</sub>.

2.0 x  $10^{-7}$  gr/dscf corrected to 12%

CO<sub>2</sub>.

3.4 x  $10^{-4}$  gr/dscf corrected to 12%

CO<sub>2</sub>.

Opacity of MWC emissions shall not exceed 15% opacity (6-min. average), except for one 6-min. period per hour of not more than 20% opacity. Excess emissions resulting from startup, shut down, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to, and the duration of excess emissions are

minimized.

50 ppmdv, corrected to 7% O<sub>2</sub> on a three hour average basis; or shall be reduced by 90% by weight on

an hourly average basis.

DER FORM 17-1.201(5) Effective November 30, 1982 Page 9 of 13

Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D., Exec. V.P.

I. D. Number:
Permit/Certification Number:
A035-193817
Date of Issue:

Expiration Date: October 25, 1996

For each pollutant for which a continuous emissions monitoring system is required in Condition No. 3, the emission averaging time specified above shall be used to establish operating limits and reportable excess emissions.

Compliance with the permit emission limits shall be determined by EPA reference methods tests included in 40 CFR Parts 60 and 61 and listed in Conditions No. 8 of this permit or by equivalent methods approved by Florida UER.

# COMPLIANCE

## 8. Compliance tests

- a. Annual compliance tests shall be conducted at yearly intervals from the date of January 15, 1991 for particulate matter, nitrogen oxides, carbon monoxide, and HCL.
- b. Annual compliance tests for the opacity standard shall be conducted at yearly intervals from the date of January 15, 1991 in accordance with 40 CFR 60.11(b) and (e).
- c. At least 90 days prior to permit expiration date, the applicant must demonstrate compliance with each permitted emission limit in Specific Condition #7.
- d. Compliance with the requirement for 70% control of sulfur dioxide emissions will be determined by using the test methods listed below or a continuous emission monitoring system for SO<sub>2</sub> emissions before and after the air pollution control equipment which meet the requirements of Performance Specification 2 of 40 CFR 60, Appendix B.
- e. The compliance tests shall be conducted at the maximum capacity and at the maximum firing rate.
- f. The following test methods and procedures of 40 CFR Parts 60 and 61 or equivalent methods shall be used for compliance testing:
  - (1) Method 1 for selection of sample site and sample traverses.

Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D., Exec. V.P.

1. D. Number:

Permit/Certification Number:

A035-193817

Date of Issue:

Expiration Date: October 25, 1996

(2) Method 2 for determining stack gas flow rate.

- (3) Method 3 or 3A for gas analysis for calculation of percent  $0_2$  and  $0_2$ .
- (4) Method 4 for determining stack gas moisture content to convert the flow rate from actual standard cubic feet to dry standard cubic feet.
- (5) Method 5 or Method 17 for concentration of particulate matter.
- (6) Method 9 for visible determination of the opacity of emissions as required in this permit in accordance with 40 CFR 60.11.
- (7) Method 6, 6C, or 8 for concentration of  $SO_2$ .
- (8) Method 7, 7A, 7B, 7C, 7D, or 7E for concentration of nitrogen oxides.
- (9) Method 10 for determination of CO concentration.
- (10) Method 12 for determination of lead concentration.
- (11) Method 13B for determination of fluoride concentration.
- (12) Method 25 or 25A for determination of VOC concentration.
- (13) Method 101A for determination of mercury emission rate.
- (14) Method 104 for determination of beryllium emission rate.
- (15) Method 26 for determination of hydrogen chloride emission rate.

## REPORTS

9. Reporting

a. Fifteen (15) days prior notification in writing of compliance tests shall be given to the Florida DER district office.

DER FURM 17-1.201(5) Effective November 30, 1982 Page 11 of 13

PERMITTEE:
Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Ph.D., Exec. V.P.

I. D. Number:
Permit/Certification Number:
A035-193817
Date of Issue:
Expiration Date: October 25, 1996

- b. The results of compliance test shall be submitted to the Central District office within 45 days after completion of the test.
- c. The owner or operator shall submit excess emission reports for any calendar quarter during which there are excess emissions from the facility. If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. The report shall include the following:
  - (1) The magnitude of excess emissions com, uted in accordance with 40 CFR 60 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each period of excess emissions (60.7(c)(1)).
  - (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measured adopted (60.7(c)(2)).
  - (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments (60.7(c)(3)).
  - (4) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report (60.7(c)(4)).
  - (5) owner or operator shall maintain file of all measurements, including continuous monitoring performance evaluations: monitoring systems or monitoring device calibration: checks: adjustments and maintenance performed on these systems or devices; and all other information required by this permit recorded in a permanent form suitable for inspection (60.7(d)).
- d. Each calendar year on or before March 1, submit for each source, an Annual Operations Report DER Form 17-1.202(6) for the preceding calendar year.

Ogden Martin Systems of Lake, Inc.

Attention: Sary K. Crane, Ph.D.,

Exec. V.P.

1. D. Number:

Permit/Certification Number:

A035-193817

Date of Issue:

Expiration Date: October 25, 1996

# EXPIRATION DATE

An operation permit renewal must be submitted at least 60 days prior to 10. the expiration date of this permit (Rule 17-4.09, F.A.C.).

STATE OF FLORIDA DEPARTMENT OF ENY-RONMENTAL REGULATION

A. Alexander, District Director 3319 Maguire Boulevard, Suite 232

Orlando, Florida 32803



# Florida Department of Environmental Regulation

Central District •

Lawton Chiles, Governor

3319 Maguire Boulevard, Suite 232

Orlando, Florida 32803-3767

Virginia B. Wethereil, Secretary

Ogden Martin Systems of Lake, Incorporated 40 Lane Road Fairfield, New Jersey 07007 - 2615

Attention: Gary K. Crane. Ph.D., Executive Vice President

Lake County - AP
Waste to Energy Facility Units No. 1 and No. 2
Permit No. AO35 - 193817
Change of conditions

Dear Dr. Crane:

We are in receipt of your request for a change of permit conditions. The conditions are changed as follows:

#### Condition

Specific Condition No. 1a

#### From

The maximum individual MWC throughput shall not exceed 288 tons per day, 120 million Btu per hour and 69,000 pounds steam per hour, (3-hour average). The maximum throughput of biohazardous waste shall not exceed a total of 1.12 tons/hour and 26.88 tons/day for the entire facility

To

The maximum individual municipal waste combustor throughput shall not exceed 288 tons per day, 120 million Btu per hour and 69,000 pounds steam per hour (3-hour average) for each unit. The maximum throughput of biohazardous waste, for Unit 1 only, shall not exceed a total of 2.15 tons/hour and 51.60 tons/day.

#### Condition

Specific Condition No. 1b

### From

The design furnace mean temperature at the fully mixed zone of the combustor shall be no less than 1800° F for a combustion gas residence time of at least one second.

Ogden Martin Systems of Lake, Incorporated Waste to Energy Facility Units No. 1 and No. 2 Permit No. AO35 - 193817

To

The furnace temperature at the fully mixed zone of the combustor shall be no less than 1800°F for a combustion gas residence time of at least one second, and the furnace roof temperature, as determined from control room readings, shall be no less than 1138°F.

Please be advised that the facility is now subject to the following requirements:

The permittee shall comply with all storage, operation and contingency requirements set forth in Rules 17-712.420 and 17-712.450.

Unit 1 is permitted to incinerate 50 tons per day or more of biohazardous waste, and therefore must have its approved Ash Management Plan kept on file with the Air Operating Permit.

Rule 17-712.420 addresses Off - Site Biohazardous Waste Storage, and Rule 17-712.450 speaks to Operation and Contingency plans. A copy of Chapter 17-712 is enclosed for your reference.

The Department is aware that these requirements may already have been met through submittals to the Waste Management program. If the aforementioned requirements have already been satisfied in this manner, please inform the Air Program Administrator, Mr. Charles Collins, of this in writing.

Sincerely

CMC

A. Alexander, P.E. District

Date

AA/lbl

Copies furnished to: Local officials John Power

Enclosure



# Department of Environmental Protection

ΤO

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell Secretary

Ogden Martin Systems, Incorporated 40 Lane Road, CN 2615 Fairfield, New Jersey 97007-2615

Attention: Brian Bahour, Assistant Vice President, Environmental Quality Management

Lake County - AP
Wasta to Energy Facility
Units No. 1 and 2
Permit No. AO35-193817
Change of Conditions

Dear Mr. Bahour:

The conditions are changed as follows:

Condition

Specific Condition No. 1.c.

#### Add

- 1.c. The firing of non-hazardous solid waste contaminated with virgin or used oil products shall be allowed if the following conditions are met:
  - A. The maximum percentage of oil contaminated solid waste defined as oil spill cleanup debris and absorbing media, including oil filters, fired in the MWC shall be a maximum of twenty (20) percent by weight of the total solid waste input, based on a rolling 30-day average. All "used oil" shall comply with the definition stated in 40 CFR 260.10 and shall not exceed the specification levels for arsenic, cadmium, chromium, lead, and the total halogens contained in Table 1 of 40 CFR 279.11, or contain any hazardous waste as defined in 40 CFR 261.3. The used oil shall have a polychlorinated biphenyl (PCB) content of less than 50 ppm (wt.).

TO

Ogden Martin Systems, Incorporated Change of Conditions
Permit No. A035-193817
Page Two

- B. Records shall be maintained showing the oil-contaminated waste generator's written certification that the waste is non-hazardous. Documentation requirements shall include a written description of the waste, a material characterization form (sample submitted with application), and the applicable material safety data sheets for the waste components. Tonnages of oil-contaminated solid waste fired shall be recorded and made available for inspection by the Department. These records shall be maintained for a period of two years.
- C. Quantities of used oil not commingled with solid waste may be burned provided that the oil has been generated entirely from internal operations of the CMS-Lake facility (i.e. no used oil in liquid form from outside generators). Records shall be maintained showing the tonnages of internally-generated used oil fixed.
- D. The permittee shall comply with all applicable requirements of federal, state and local regulations including 40 CFR 261 (Federal Hazardous Waste Regulations), 40 CFR 279 (Federal Used Oil Management), Chapter 62-701, F.A.C. (Solid Waste Management Facilities), Chapter 62-710, F.A.C. (Used Oil Management Regulations), Chapter 62-730, F.A.C. (Hazardous Waste Regulations).

All other conditions remain the same.

This letter must be attached to your permit and becomes a part of that permit.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

CMC/

Vivian F. Garfein

Director of District Management

August 8

vrg:jee#

copies furnished to:

local officials



# Department of Repartment of Environmental Protection

Lawren Chiles Gevernor Twin Towers Office Building 2600 Bisir Scone Road Tallahassee, Herida 22399-2400

Virginia B. Wethereil Secretary

June 19, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Brian Bahour Assistant Vice President Environmental Quality Hanagement Ogden Martin Systems, Inc. 40 Lane Road, CM 2613 Pairfield, New Jersey 07007-2615

Re: Amendment of Air Construction Permit PSD-FL-113 (AC 35-115379) Eake County WTE Facility

Dear Mr. Bahour:

On March 20, 1995, the Department received; your request for an amendment of the referenced permit to allow fixing of non-hazardous solid; waste contaminated with virgin or used oil products. The Department finds this request acceptable and hereby emends the permit as shown below:

MEW SPECIFIC CONDITION 1.e.1.:

- 1.4.1. The firing of non-hazardous solid waste contaminated with virgin or used oil products shall be allowed if the following conditions are mat:
- A: The maximum percentage of oil-contaminated solid waste defined as oil spill cleanup debris and absorbing media, including oil filters, fired in the MWC shall be twenty (20) percent by weight of the total solid waste input, based on a rolling 30-day average. All "used oil" shall comply with the definition stated in 40 CFR 260.10 and shall not exceed the specification levels for arsenic, cadmium, chromium, lead, and total halogens contained in Table 1 of 40 CFR 279.11, or contain any hazardous waste as defined in 40 CFR 261.3. The used oil shall have a polychlorinated biphenyl (PCB) content of less than 50 ppm (wt.).
- B. Records shall be maintained showing the oil-contaminated waste generator's written certification that the waste is non-hazardous. Documentation requirements shall include a written description of the waste, a material characterization form (sample submitted with application), and the applicable material safety data sheets for the waste components. Tonnages of oil-contaminated solid waste fired shall be recorded and made available for inspection by the Department. These records shall be maintained for a period of two years.

ΤIJ

Mr. Brian Bahour Page Two June 15, 1995

- C. Quantities of used oil not commingled with solid waste may be burned provided that the oil has been generated entirely from internal operations of the OMS-Lake facility (i.e. no used oil in liquid form from outside generators). Records shall be maintained showing the tonnages of internally-generated used oil fired.
- D. The permittee shall comply with all applicable requirements of faderal, state and local regulations including 40 CFR 261 (Federal Hazardous Waste Regulations), 40 CFR 279 (Federal Used Cil Management), Chapter 62-701, F.A.C. (Solid Waste Management Facilities), Chapter 62-710, F.A.C. (Used Cil Management Regulations), Chapter 62-730, F.A.C. (Hazardous Waste Regulations).

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC 35-115379 (PSD-FL-113).

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Virginia B. Wetherell, Secretary

## CERTIFICATE OF SERVICE

This is to certify that this Permit Amendment and all copies were mailed to the listed persons before the close of business on April 28, 1995.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Chapter 120.52(9), Florida Statutes, with the designated Deputy Clark, receipt of which is hereby acknowledged.

Friedork Gazan

co: C. Collins, CD J. Harper, EPA J. Bunyak, NPS Lake County Beard of County Commissioners

Virginia B. Wetherell

J. boine (Acco) C. Boutwright (lat

Gross Ochoste

ce: Crane Iclett Walson



# Department of Environmental Protection

Lawton Chiles Governor Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

NOTICE OF PERMIT

CERTIFIED MAIL P 185 468 654

Ogden Martin Systems of Lake, Inc. 40 Lane Road Fairfield, NJ 07007-2615

Attention: Gary K. Crane, Executive Vice President-Environmental

Lake County - AP
Activated Carbon Storage Silo

Dear Mr. Crane:

Enclosed is Permit Number AC35-264176 to construct the above referenced source issued pursuant to Section(s) 403.087, Florida Statutes.

Any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

APR 1 7 1995

ENVIRONMENTAL DEPT.

Vivian F. Garfein Director of District Management

DATE: 4/14/95

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

VFG/jtt

Copies furnished to:

# CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on to the listed persons,



# Department of Environmental Protection

Lawton Chiles Governor Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell Secretary

Permittee:

Ogden Martin Systems of Lake, Inc.

40 Lane Road

Fairfield, NJ 07007-2615

Attention: Gary K. Crane, Executive

Vice President-Environmental

I.D. Number:

Permit Number: AC35-264176
Date of Issue: 4/14/95

Expiration Date: February 28, 2000

County: Lake

Latitude/Longitude: 28°44'22"N/81°53'23"W

UTM: 17-413.1 KmE; 3179.3 KmN
Project: Activated Carbon Storage

Silo

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can construct an activated carbon storage silo and transport equipment utilized to inject activated carbon into the flue gas stream to control mercury vapor emissions and other air pollutant emissions. The storage silo is equipped with a baghouse with an air to cloth ratio of 3:1 and a particulate removal efficiency of approximately 99.9 percent.

The source is located at 3830 Rogers Industrial Park Road in Okahumpka, Lake County, Florida.

General Conditions are attached to be distributed to the permittee only.

DEP FORM 62-1.201(5) Effective November 30, 1982 Page 1 of 5

#### GENERAL CONDITIONS:

The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and arbinding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed a notice that the Department will review this permit periodically and may initiate enforcement action for any violation at these conditions.

- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings c exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit matconstitute grounds for revocation and enforcement action by the Department.
- 3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights of any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of persons rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
- 4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust fund may express State opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - (a) Have access to and copy any records that must be kept under conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - (a) A description of and cause of noncompliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

#### TRAL CONDITIONS:

- 9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and or information relating to the construction or operation of this permitted source which are submitted to the Department may used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statuor Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for complian provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 162-30.300, F.A.C., applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approby the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
  - ( ) Determination of Sest Available Control Technology (SACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of compliance with state Water Quality Standards (Section 401, PL 92-500)
  - ( ) Compliance with New Source Performance Standards
- 14. The permittee shall comply with the following:
  - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitori information (including all calibration and maintenance records and all original strip chart recordings for continuo monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of a data used to complete the application for this permit. These materials shall be retained at least three years from t date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. the date, exact place, and time of sampling or measurements:
    - 2. the person responsible for performing the sampling or measurements:
    - 3. the dates analyses were performed;
    - 4. the person responsible for performing the analyses;
    - 5. the analytical techniques or methods used;
    - 6. the results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted to were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Page 3 of

PERMITTEE: I.D. Number:

Ogden Martin Systems of Lake, Inc. Permit Number: AC35-264176

Attention: Gary K. Crane, Executive Expiration Date: February 28, 2000

Vice President-Environmental County: Lake

#### SPECIFIC CONDITIONS:

## **OPERATING CONDITIONS**

1. This source is permitted to operate continuously, per the application.

- 2. The source must be properly operated and maintained (Rule 62-210.300(2)(a)2, F.A.C.). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly [Rule 62-210.650, F.A.C.].
- 3. The engineering information on the carbon injection system concerning the carbon injection rate and transport speed will be furnished within 60 days.

#### EMISSION LIMITS

- 4. The visible emissions from this source must comply with Rule 62-296.310(2), F.A.C. (limited to less than 20% opacity).
- 5. Particulate matter emissions from plant grounds shall be subject to reasonable precautions as provided by F.A.C. Rule 62-296.310(3), F.A.C. including the following:
  - a. Area must be watered down should unconfined emissions occur.
  - b. The loading operation shall be maintained and properly operated.
- 6. No objectionable odors will be allowed, as per Rule 62-296.320(2), F.A.C.

## COMPLIANCE TESTING

- 7. The source must be tested for visible emissions in accordance with DEP Method 9 for 30 minutes or the length of the batch/cycle within 30 days after the source is placed in operation.
- 8. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity [Rule 62-297.310(2), F.A.C.].

Ogden Martin Systems of Lake, Inc.

Attention: Gary K. Crane, Executive

Vice President-Environmental County: Lake

I.D. Number:

Permit Number: AC35-264176

Expiration Date: February 28, 2000

SPECIFIC CONDITIONS: (Continued)

9. The permittee shall notify the Central District Office of the Department of Environmental Protection, in writing, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time and place of each such test, and the contact person who will be responsible for coordinating and having such tests conducted for the owner. The Department may waive the 15 day notice requirement on a case by case basis [Rule 62-297.340(1)(i), F.A.C.].

10. The required test report shall be filed with the department no later than 45 days after the last sampling run of each test is completed [Rule 62-297.570(2), F.A.C).

#### EXPIRATION DATE

11. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new request for an extension of the construction permit.

The permittee must notify the Department in writing of the startup date for any source covered by this permit. This notification must be addressed to the Permitting Section and received no later than 15 days after startup.

An operating permit is required for operation of this source. To obtain an operating permit, the permittee must demonstrate compliance with the conditions of the construction permit and submit the application fee, along with compliance test results and Application for Air Permit to the Department's Central Florida District office no later than 60 days prior to the expiration date of the construction permit.

This permit will expire February 28, 2000 or six months after construction is completed, and the source is placed in operation, whichever date occurs first.

> STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Vivian F. Garfein

Director of District Management

ISSUED

DEP FORM 62-1.201(5) Effective November 30, 1982 Page 5 of 5



# Department of Environmental Protection

Lawton Chiles Governor Central District 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767

Virginia B. Wetherei Secretary

Ogden Martin Systems of Lake, Inc. 40 Lane Road Fairfield, New Jersey 07007-2615

Attention: Gary K. Crane, Executive Vice President

Lake County - AP
Activated Carbon Storage Silo
Permit No. AC35-264176
Change of Conditions

Dear Mr. Crane:

We are in receipt of your description of a mercury control system as required by Special Condition No. 3. The control system's operation will be added as a condition to your permit as follows:

# Page 4. Specific Condition No. 3

#### From

3. The engineering information on the carbon injection system concerning the carbon injection rate and transport speed will be furnished within 60 days.

#### Ta

- 3. The operation of the carbon injection system used to control mercury emissions shall be as follows:
  - a. The carbon injection rate will be 11 lbs/hr. at a rate of 60-80 ft/second.
  - b. The carbon grind size will be at least 95% passing through 325 mesh.
  - c. The activated carbon will be pneumatically conveyed and injected into the flue gas duct near the scrubber inlet.
  - d. The pressure in the carbon duct will be approximately 1.5 psig.
  - e. The activated carbon along with the adsorbed mercury, dioxins and other heavy metals will be captured in the scrubber under flow and in the baghouse for disposal along with the fly ash and the bottom ash .
  - f. Pursuant to Rule 62-296.416(3)(a), mercury emissions shall be limited to 70 micrograms/DSCM @ 7% O<sub>2</sub> or 20%, by weight, of the initial flue gas mercury content.

RECEIVED

MAY 2 6 1995

Ogden Martin Systems of Lake, Inc. AC35-264176 Change of Conditions Page Two

All other conditions remain the same.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

CMC

Vivian F. Garfein

Director of District Management

Date

VFG/hh

Ogden Projects, Inc. 40 Lane Road, CN2615 Fairfield, NJ 07007-2615 201 882 9000 Fax 201 882 7357

May 8, 1996

Doug Beason, Esq.
Office of General Counsel
Florida Department of Environmental Protection
Twin Towers, Mail Sta. #35
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Re: Ogden Martin Systems of Lake, Inc.

Medical Waste - Unit 2

Dear Mr. Beason,

We are writing to ask for some additional clarification about the status of this combustion unit. We had written to the Central District Air Program Administrator on December 4, 1995 to provide notification required under our construction permit of our intent to conduct compliance testing for the processing of biohazardous waste in Unit 2 of this facility. We have received a letter from the Acting Program Administrator for Air Resources Management, dated January 24, 1996, stating that OGC had determined that incineration of biohazardous waste in this unit would not be allowable under the moratorium in effect for new medical waste incinerators. I believe the moratorium on the permitting or construction of new biomedical waste incinerators under Chapter 92-31 became law originally on March 20, 1992 and was revived on June 2, 1994, effective through October 1, 1996.

You advised Mr. Kozlov via e-mail dated 22 Jan 1996 that the statutory moratorium on issuance of new construction permits for medical waste incinerators would apply if this unit were not now permitted for this waste. I agree with your analysis, but the premise you were operating under is incorrect. As you and I have discussed, and as copies of your e-mail correspondence with Mr. Kozlov before that date indicate, you did not review any of the permits for this facility in the course of your analysis and were basing your advice on the representations by Mr. Kozlov that permit authority to process medical waste in Unit 2 does not exist.

Doug Beason, Esq May 8, 1996 Page 2

However, the permits in effect for this unit authorize the combustion of medical waste, and predate both pieces of moratorium legislation. There is no new construction or modification of the facility needed for us to process this waste. As you may not be aware, we installed a conveyor system on this unit which, although it is intended for the feeding of bulk materials, will facilitate the feeding of containerized medical waste to Unit 2 in the same manner as we have been accepting it in Unit 1. Thus, we believe that there is current, valid legal authority to process medical waste. This letter will summarize our understandings and operating presumptions regarding the permitting history of the facility and Unit 2 as it regards medical waste. Copies of all the documents that I will reference are attached.

TO

The permit to construct was dated February 12, 1988 under permit number AC-35-115379, PSD-FL-113, and set a throughput limit of 288 tons per day of municipal solid waste for each unit but only identified that and wood chips as the types of waste that could be processed under that limit. An amendment to this permit dated Dec. 10, 1990 was made by the FDEP "to clarify the definition of municipal solid waste to include biohazardous waste, and to include specific conditions of compliance for the burning of biohazardous waste." This modification revised the project description and specific conditions 1.g. and 3.d., and added specific condition 3.k., applicable to both combustion units, to make them consistent with FDEP regulations governing biohazardous waste facilities. These emission limits continue to be in effect for both units, notwithstanding that medical waste has never yet been processed in Unit 2.

Operating permit AO35-193817 was issued on December 11,1991, and reissued on January 29, 1992, to provide for the same 288 tons per day of municipal solid waste throughput and also authority to process biohazardous waste during compliance testing, to "be conducted while combusting the maximum desired rate of biohazardous waste," and for 90 days thereafter during DEP's review of the test results. This permit was later amended, on June 29, 1992, following the successful completion of stack tests on Unit 1, to add to special conditions 1.a and 1.c the throughput limit for biohazardous waste of 1.12 tons per hour and 26.88 tons per day "for the entire facility." This permit change was captioned for "Waste to Energy Facility Units No. 1 and 2." This was intended by FDEP to allow either or both units to process medical waste, after Unit 2 had demonstrated compliance with relevant emission limits operating at a rate of 1.12 tons per hour of biohazardous waste, and while both units were operating at their maximum permitted solid waste capacity. "If the results are satisfactory, the facility will be permitted to process a maximum total of 1.12 tons/hr (26.88 tons/day) of biohazardous waste between both units. If the permittee desires to increase the combined maximum total throughput of biohazardous waste above 1.12 tons/hr, then a permit modification shall be required," explained Mr. Clair Fancy, Chief of Bureau of Air Regulation, in a letter dated Sept. 2, 1992.

Permit AO35-193817 was again amended on May 25, 1993 following the annual compliance tests

Doug Beason, Esq May 8, 1996 Page 3

on Unit 1, to expand the limit in condition 1 a to read, "The maximum throughput of biohazardous waste, for Unit 1 only, shall not exceed a total of 2.15 tons per hour and 26.88 tons per day." Specific Condition 6 e remains the same as it did following the June 29, 1992 permit change. It is our understanding that the language "..., for Unit 1 only, ..." added to specific condition 1 a. was merely to codify the fact that only Unit 1 had then demonstrated compliance with emission limits as required by specific condition 6.e.

The sum of this activity indicates to us that we have been authorized to accept and process medical waste in both units since January 29, 1992. Unit 2 need only conduct the stack tests enunciated in the Construction permit as amended on December 10, 1990 to confirm that the emission limits are satisfied before it can proceed to routinely accept such waste.

We are very interested to resolve this question at the earliest possible time, because our clients, both municipal and private, are looking to us to provide disposal for waste that they are generating now. If I may request you to devote a little more time to consideration of the details provided in this letter, can you provide your evaluation of how this permitting history fits into your earlier analysis of this question.

It seems from reviewing the e-mail you exchanged with Mr. Kozlov, which we did under the Public Records Act, that both of you were focusing primarily on whether one or both units were considered in the definition of the word "facility" in the moratorium statute and that you were both proceeding on the assumption that Unit 2 had not been mentioned or authorized in any permit that proceeded the date of the moratorium. As you can see, the record indicates a different result to us.

It would be best if you could provide us with a written reply, preferable with a copy direct to Mr. Koziov also.

Please feel free to, call me at 201-882-7205 to discuss any questions.

Simoerely.

Kurt W. Rieke

Assistant General Counsel

Doug Beason, Esq May 8, 1996 Page 4

cc:

Leonard Kożlov, FDEP (w/enci.)

Jason Gorrie, OPI (w/o encl.)

Cecil Boatwright, OMSL (w/o encl.)

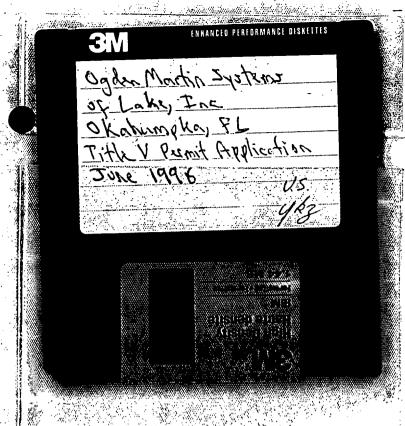
Drew Lehman, OPI (w/o encl.)

Enclosures:

1. Letter, dated Dec. 4, 1995 from Dr. Gary Crane, Ogden Martin Systems of Lake, Inc., to FDEP Central District Air Program Administrator

TO

- 2. Letter, dated Jan. 24, 1996, from Leonard Kozlov to Gary Crane
- 3. E-mail transmissions between Leonard Kozlov and Douglas Beason, obtained from FDEP under Public Records Act, dated Jan. 5-22, 1996.
- 4. Permit to Construct, dated Feb. 24, 1988
- 5. Permit to Construct, amended Dec. 10, 1990
- 6. Permit to Operate, dated Jan. 29, 1992
- 7. Permit to Operate change, dated June 29, 1992
- 8. Letter, dated Sept. 2, 1992 from Mr. Clair Fancy, FDEP, to Gary Crane



ENHANCED PERFORMANCE DISKETTES
Ogden Mostin Systems of Lake, Inc
of Lake, Inc
Title V Panit Application
June 1996
Company of the Compan
Aristog (186)

